

UNITED STATES DISTRICT COURT

for the

Southern District of New Yorkcivil Division

22 CV 06054

Case No.

(to be filled in by the Clerk's Office)

Jolie Bailon

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☐ No

"Tollen Presents" -v- Street Team Software LLC
 Tripper Network Travel Experiences Inc dba
 Tripper
 Wynn Resort Holdings LLC / Wynn Resort
 Limited

Street Team Software LLC
 130 Millennium Drive Los Angeles CA 90094

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Justin Bieber / Scooter Braun Projects
 LLC
 122 East 42nd Street
 18th Floor, New York
 10169

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Jolie Bailon</u>
Street Address	<u>4300 Broadway #1008</u>
City and County	<u>New York, NY</u>
State and Zip Code	<u>NY 10033</u>
Telephone Number	<u>305 322 3139</u>
E-mail Address	<u>jolies photography@icloud.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Wynn Resorts Holdings LLC / Wynn Resort
 Job or Title (if known) limited
 Street Address owner/organizer
 City and County 3131 Las Vegas Blvd S
 State and Zip Code Las Vegas
 Telephone Number NV 89109
 E-mail Address (if known) _____

Defendant No. 2

Name "Pollen Presents" d.b.a Street Team LLC ^{Software}
 Job or Title (if known) _____
 Street Address 767 S Alameda Street, Suite #300,
 City and County Los Angeles,
 State and Zip Code CA 90021
 Telephone Number _____
 E-mail Address (if known) _____

Defendant No. 3

Name StreetTeam Software LLC, dba Pollen
 Job or Title (if known) _____
 Street Address 12130 Millennium Drive,
 City and County Los Angeles,
 State and Zip Code CA 90094
 Telephone Number _____
 E-mail Address (if known) _____

Defendant No. 4

Name "Trippr Network Travel Experiences, Inc dba Trippr
 Job or Title (if known) _____
 Street Address 10845 Griffith Peak Drive,
 City and County Las Vegas
 State and Zip Code NV 89135
 Telephone Number _____
 E-mail Address (if known) _____

Defendant #5: Justin Bieber / Scooter Braun Projects
122 East 40th St
18th Floor, New York 10168

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. ▶ 15 U.S.C. § 1125 1a of Lanham Act ▶ N.Y. Antitrust Law trust section 340-347 OF GBL know as Donnelly Act
 ▶ Section 5(a) of FTC Act Section 43(a)
 ▶ N.Y.C. GBL § 350 ▶ N.Y.C. Admin Code Consumer Protection Law § 20-700
 ▶ N.Y.C. GBL § 349 ▶ N.Y.C. Admin Code Consumer Protection Law § 20-700(b)(1) definitions 1-5
 The Sherman Act
 The Clayton Act
 Price Fixing, tying error

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the
 State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
 under the laws of the State of (name) _____,
 and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of
 the State of (name) _____. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Defendants are guilty of defrauding me using the likeness of Justin Bieber.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Defendants used Justin Bieber to host an event where they fraudulently claimed it was an intimate personal and up close experience.

(see attachments exhibit A)

(21 claims related to common Law Fraud and ~~deceptive~~ deceptive marketing)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

see attachments Exhibit A and E)

Plaintiff seeking to recover / be restored with refund and all appropriate damages recoverable under each claim. (\$10,000 or direct and indirect)

(All expenses from trip, Punitive, Restitution, equitable relief)

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

07/15/2022

Signature of Plaintiff

Printed Name of Plaintiff

Joel Bailon
Joel Bailon**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

Defendant #1:

Pollen Presents aka Street Team Software LLC specializes in the fields of events, travel, festivals, entertainment, experiences, membership, youth culture, and marketplace. They often facultate ticket sales for such events.

Defendant #2:

Wynn Resorts Holdings LLC, Wynn Resorts Limited , owns XS Night Club and Encore Beach Club as part of the Wynn Resort chain of hotel and establishments in Las Vegas.

Justin Bieber & Friends Las Vegas 3 day Weekender was hosted at Wynn/Encore's night clubs.

Defendant #3:

Trippr Network Travel Experiences, Inc dba Trippr is a one-stop shop for group travel, and small group travel experiences.

Defendant #4:

Street Team Software LLC, dba Pollen specializes in the fields of events, travel, festivals, entertainment, experiences, membership, youth culture, and marketplace. They often facultate ticket sales for such events.

Defendants above collectively partnered and are responsible for the promotion organization and advertisement of "Justin Bieber & Friends Las Vegas Weekender." Which took place 10/07/2021 - 10/10/2021.

Defendant #5:

Justin Bieber / Scooter Braun Projects
(manager)

122 ~~122~~

EAST 42nd ST

18th floor, New York
10168

Facts of Complaint

1. On August 5th 2021, Defendant's announced via social media that they would be hosting "Justin Bieber & Friends Las Vegas Weekender."
2. At that time of announcement, defendant's instructed anticipating fans to sign up for updates via email.
3. The initial promotional post had a starting price based on 2 person occupancy.
4. This lead many fans to believe that they would be splitting the starting price, not paying per person.
5. The promotional material A included a video featuring Justin Bieber riding in a car, with a pan over Las Vegas Skyline with an official title "Justin Bieber & Friends Las Vegas Weekender". The promotional video includes Rory Kramer & Matt B endorsing the event. Rory Kramer is Justin Bieber's personal Photographer. As a fan I relied on the endorsements celebrities relevant to the event to decide if it was worth purchasing/ attending. At this point, I believed this event was happening. *Exhibit 3*
6. On August 12th 2021, Defendants sent out an update email, informing fans that more details would be released soon.
7. On August 18th 2021, defendants sent an email stating tickets would go on sale that Friday. The email included details of the events itinerary.
8. On August 19th 2021, user @JustinBieber posted Promotional Material B via twitter, and instagram. *Exhibit 3*
9. Promotional Material B claimed that Justin Bieber himself curated the performances and experiences of the event. *Exhibit 3*
10. Promotional Material B claimed that this was intimate experience. *Exhibit 3*
11. Promotional Material B claimed fans would get to be up close and personal with Justin Bieber. *Exhibit 3*

12. Promotional Material B stated that Justin Bieber, David Guetta^{*}, The Kid Laroi, Kehlani,

Troyboi, and Eddie Benjamin. On 10/09/2021, Pollen informed fans via email David Guetta would not be attending.

13. Promotional Material B was reposted by all performers.

14. The promotional material since then has been taken down by some parties.

15. Under Promotional Material B post on @Pollen's Instagram, people ask if there will be party passes only available.

16. Pollen on several occasions claim there will be no party only passes and that all packages came with accommodation.

17. On August 20th 2021, virtual waiting rooms were said to open 11AM PST.

18. Tickets went on sale at 12 PM PST.

19. Defendants prompted us to be ready as they expect packages to sale out almost as soon as they go on sale.

20. At the time, there was no option for the cheapest hotel options.

21. I was forced to purchase the most expensive option of for the Wynn Encore for \$1699.

22. I paid my first 1 of 3 installments. (\$575.00)

23. After purchase, on August 22nd, 2022 Defendant's sent me an email asking to recruit friends into joining me.

24. Pollen kept advertising that the event was sold out, but kept releasing passes they claimed they didn't have.

25. On September 20th, 2022, Defendants send an email out offering "VIP" for the event.

26. VIP was said to included VIP Proirity entry to all events, Exclusive VIP Area at all venues, Complimentary Seltzer, Beer, and water at XS/ Encore Beach Club and on site VIP Concierge.

27. Defendants stated that there was a limited supply of VIP.

28. They claimed the capacity would be 3,000 people. Every week until the event they were releasing tickets. Exhibit 2

29. Later we find out the tickets were being sold for entry under a different event name for \$45.00.
30. On _____, Pollen sent out emails claiming VIP would have front row views.
31. On _____, Pollen sent out emails claiming add- ons would be available soon. These add- ons would be: A sound check Q&A - get up close and personal , Belieber's Brunch - Bottomless Brunches and playing non stop Justin Bieber hits.
32. The "Add-on" email clearly displays "3 day weekend *With* Justin and his closest friends."
33. Pollen told fans Justin would attend several events during the weekend.
34. Pollen made unauthorized upgrades to peoples itineraries, and promised that they would not have to pay upgraded security deposits and fees.
35. Pollen advertised meet and greets. No meet and greets were added.
36. On September 21st 2021, my second installment of \$575.00 was charged to my card by Trippr.
37. On September 24th 2021, Pollens Senior Inside Sales Agent, Chip Olsen sent me an email stating that he held back 50 party pass only and offered to sale them to me.
38. Chip Olsen also contacted my plus one claiming to have a few more VIP Suites for \$4,000.
39. Chip also stated that the event would only be 3,000 in capacity.
40. Day 1 (10/07/21) fans with upgrades check in and are told they most pay resort fee per day and \$250 deposit. This is clearly not what Pollen promised.
41. Kehlani performs at 2:00AM PST.
42. Kehlani comments that she's never performed so late.
43. The Kid Laroi & Jaden Smith put on performances at Pool Party in Encore Beach Club.
44. VIP benefits were not active at these festivities thus making us have to pay \$60per 2 shots and a chaser.
45. Chicken tenders cost \$75.00 and were not included as part of belieber brunches.
46. 75% of seating at pool party were reserved from \$3,000 to \$20,000.
47. Justin Bieber did not attend any of the activities or festivities on opening night or day 1.

48. Day 2: Area 51 had only 1 Mexican food cart outside.
49. Area 51 had one merch table with unofficial Justin Bieber merchandise.
50. Area 51 did not have a career wall dedicated to showcasing Justin Bieber's career, nor did it have a listening wall.
51. Defendants claimed Justin Biebers favorite skate boarders would be there yet it was only local skate boarders.
52. Area 51 DJ only played the same 2 songs; peaches, and sorry by Justin Bieber. Other than that dj set played songs out of the genre related to Justin Biebers.
53. I left shortly after arriving because there was nothing to do hit stand around and watch locals skate board and talk to groupies.
54. The after party at Encore Beach Club did not play any Justin Bieber songs.
55. I was denied entry to Afterparty at XS even with VIP.
56. I was told that VIP was for a different party.
57. Justin Bieber was not in attendance of any activities or festivities this day.
58. Day 3: The day of Justin Bieber's performance, there was no VIP line.
59. VIP was treated as General Admission.
60. There was only one entry for both VIP and General Admission
61. When fans tried to line up, we were yelled and cursed at for Pollens lack of organization.
62. Fans were threatened by security that they wouldn't let us in if we didn't leave.
63. When I tried to claim my drinks, I was denied and told to pay.
64. They was no VIP Conceige.
65. VIP promised Front Row views were obstructed by Tables sold under a different event name.
54. Justin Bieber arrived approximately 3 hours before his headline performance.
55. Justin Bieber preformed at 1:00AM PST.
56. Justin Bieber only preformed for an hour and left right after.

57. I suffered extreme anxiety in result of realizing I spent way too much money for an hour performance which was not advertised. I suffered sleep deprivation being from the east coast and being 3 hours behind.

58. On 03/31/2022 I got to see Justin Bieber for more than an hour, an hour away from home.

59. I paid only \$750.00 for front row and received a real up close and personal experience without being deceived into thinking the event would be intimate.

Claims

1. Breach of Contract

Defendants breached its contractual obligation repudiating promise(s) regarding Justin Bieber's appearances and activities. The defendants failed to perform all promises related to Justin Bieber other than his headlined performance.

2. False Advertisement

1. Defendants falsely claimed the exclusivity of the event, claiming the full capacity of the event would be 3,000. This was not the case, as tickets were sold up to the night of the event for \$45.00 and up to \$10,000 for table.

2. Defendants lied about not having party passes available to induce fans to purchase over priced hotel packages.

3. Defendants stated advertised VIP As Priority Entry and other perks. VIP was treated no different than general admission. All outlined benefits were not fulfilled.

4. Defendants falsely advertised "add on's" that were never added on.

5. Defendants lied about Justin Bieber having control over the event. As beliebers, we know Justin best. The entire event had nothing to do with Justin Bieber.

6. Defendant used a consumer oriented strategy to defraud fans using Justin Bieber's likelihood.

Violation: Lanham Act, § 43(a) (which is codified at 15 U.S.C. § 1125(a)).

G.B.L 350

3. Fraud

1. The material representation of the defendants event was false on the basis' that A. Justin Bieber did not curate the event. His brand and likelihood was used by greedy corporations to defraud his fans. B. All promises were not materialized at all. This resulted in the obviously disappointment and realization of over spending for an event worse than a concert.

2. The Plaintiff relied on the collective endorsements of celebrities involved to make the decision on rather this was completely legit.

Plaintiff could have spent only \$700.00 for front row for a local venue concert for a more "up close and personal" experience.

Civ. Code § 1709 (Fraudulent deceit)

4. Fraud Inducement

1. The defendants misrepresented the event as a Bieber fan experience. They lied about the nature of the event, its exclusivity, and capacity.
2. The defendants also charged some fans an extra \$350 for VIP but treated them like general admission.
3. At the time that tickets were released, the defendants were fully aware that Justin Bieber would only make an appearance the last night of the 3 day weekend.

5. Fraudulent Misrepresentation

1. I assert individually and on behalf of all others similarly effected a claim for deceptive acts and practices in violation of General Business Law G.B.L. § 349 for common law fraud and fraudulent misrepresentation.

2. The defendants knew in definitely that the statements and representations of the event advertised were completely false.

3. The defendants acted to deceive and mislead fans into purchasing over priced hotel packages.

6. Negligent Misrepresentation

1. I assert individually and on behalf of all others similarly effected a claim for deceptive acts and practices in violation of General Buisness Law G.B.L 349 for common law fraud and negligent misrepresentation.

2. Defendants breached its fiduciary duties as the seller, when they failed to inform targeted fans that Justin Bieber in fact wouldn't not be making appearances nor would the event be something centered around "beliebers."

3. Defendants intentionally lied about the exclusivity of the event to get sales. (Via advertising material)

4. Plaintiff and other fans all suffered from canceled and delayed flights, extended stays and other expenses relevant to flying cross country.

7. Intentional Misrepresentation

1. I assert individually and on behalf of all others similarly effected a claim for deceptive acts and practices in violation of General Buisness Law G.B.L 349 for common law fraud and intentional misrepresentation.

2. Defendants stated through their collective advertising and celebrity endorsements that this event would be exclusive and intimate.

3. Defendants falsely over exaggerated the exclusivity of the event, claiming the full capacity of the event would be 3,000.

4. Defendants stated advertised VIP As Priority Entry and other perks. VIP was treated no different than general admission.

5. Defendants falsely advertised add one that were never added on.

6. Defendants lied about Justin Bieber having control over the event. As beliebers, we know Justin best. The entire event had nothing to do with Justin Bieber. Justin Bieber was only a headliner, and plaintiff could have waited to go to Justin Bieber's Justice Tour.

7. The claims above prove the Defendants acted with intent to deceive and were evidently recklessly made.

8. Liability on Basis of Intentional Torts, Negligence

On the count of negligent and intentional misrepresentation.

9. negligence

1. Defendants breached its fiduciary duties as the seller, when they failed to inform targeted fans that Justin Bieber in fact wouldn't not be making appearances nor would the event be something centered around "beliebers."

2. Defendants intentionally lied about the exclusivity of the event to get sales.

3. Plaintiff and other fans all suffered from canceled and delayed flights, extended stays and other expenses relevant to flying cross country.

10. Breach of Fiduciary Duty

1. Plaintiff and defendants entered a fiduciary relationship once Plaintiff completed first deposit transaction.

2. Plaintiff trusted Defendants as the hosts of the event to follow through with their promises.

Plaintiff relied on the false representation of the event advertised through social media and endorsed posts by acts performing at the event.

3. The Defendants falsely over exaggerated the exclusivity, Quality of the event.

4. The defendants breached the trust plaintiffs placed with them, making the unexpected inconvenience of fees not worth the experience.

11. Bait and Switch

The Defendants made false statements and misrepresentation regarding the event. It is clear that the defendants advertised with the intentional to deceive fans into purchasing hotel packages.

The FTC has determined deceptive practices are unlawful under Section 5(a) 1 of the Federal Trade Commission Act.

12. Violating Anti Trust Laws under FTC (Price Fixing) N.Y Anti Trust Law Section 340-347 of General Buisness Law known as FTC Act; The Sherman Act, The Clayton Act & Donnelly Act.

Defendants falsely advertised the price of the packages to be "price based on 2 people occupancy" while anticipating the announcement of when tickets would go on sale. Once tickets went on sale, the terms were switched to "per person".

Defendants falsely claimed there would be no “party only” passes available at the time when packages go on sale.

This practice of deceptive and predatory sales tactic aggressively forced targeted fans to commit to purchasing the over priced hotel packages in efforts of securing their “up close and personal” experience with their idol. Here, the defendants actions were consumer oriented and part of their efforts to sale tickets.

Plaintiff again, relied on the material fact that all acts included in this event reposted the exact same advertising material as the defendants.

Defendants falsely over exaggerated the exclusivity of the event, claiming the full capacity of the event would be 3,000.

The night of Justin Bieber’s headline performance, sales for tickets were still available on a separate clubs website. Tickets ranged from \$45.00 for entry and up to \$10,000 for a table. There was clearly no cap on capacity/ ticket sales.

13. Violating Anti Trust Laws under Lanham (Tying Arrangements)

The Defendants were the sellers with market power over the “tying product”, “tickets/ access to the event” told fans they must purchase packages with partnered hotel chains.

Defendants later began releasing “Party Pass” only once their online sales system declared all hotel packages to be “sold-out.”

14. Omission-Based under GBL. 349

Defendants had clear knowledge of the material fact that the event would NOT be the intimate up close and personal experience they false advertised.

Defendants failed to provide this essential information which was relevant to the plaintiff as the consumer. (Bildstein v. MasterCard Intl, Inc., 2002 U.S. Dist. LEXIS 10763* 10-11 2005 WC 1324972, * 4LS.D.N.Y. 2005) quoting "Oswego", 85 N.Y.2d at 26, 623 N.Y.S 2d 529, 647 N.E.2d 741)

Plaintiff relied on the information available regarding the event that had been released. Plaintiff reasonably investigated the event and event seemed to be real.

All artist and musicians involved reposted the advertising which lead the plaintiff to believe that the event was in fact real.

15. Unjust Enrichment

1. Defendants clearly benefited from deceiving the Plaintiff into believing the event was more exclusive than it turned out to be.

2. Defendant's specifically targeted fans of Justin Bieber into believing that he would be giving them a personal experience like never before.

3. That equity requires restitution (Beth Israel Med. Ctr. v. Horizon Blue Cross & Blue Shield of N.J., Inc 448 F.3d 573, 586 2d Cir. 2006)

16. Material Misrepresentation

The defendants intentionally spaced out weeks at a time to give details regarding the event to induce anticipation of the false represented "up close and personal" event. Most statements regarding the quality and capacity of event was completely false. The aggressive sales tactic and sketchy detail reveal induced every reasonable fan to purchase the packages. The defendants lied about how intimate the event was, thus deceiving the fan to believe this was a once and a life time event.

Outlined promises were breached and never fulfilled.

17. Premises Liability/Liability

Defendants are the invitees in this instant and have invited plaintiff to establishment and gave permission for entry for its benefit via sales transaction.

18. Emotional Distress

1. Plaintiff, along with other fans effected by the defendants illegal conduct suffered severe emotional distress following the realization we had been defrauded.
2. Defendants did not acknowledge the mistake they have made and offered only \$150 incentive to attend future events with them.
3. Defendant's behavior after suggest that they intended to defraud fans.
4. Spending \$700 on a front row ticket in my city is better than loading over \$10,000 from a fraudulent event.
5. I suffered extreme anxiety in result of realizing I spent way too much money for an hour performance which was not advertised. I suffered sleep deprivation being from the east coast and being 3 hours behind. Sleep deprivation added to the stress and anxiety.

19. Alternative Liability

In the event that defendant's affirm that neither had anything to do with the defrauding scheme using Justin Bieber, both parties are equally responsible being the organizers of the event.

20. Tort of Deceit

Liable under the claim of negligent misrepresentation. [Bily v. Arthur Young & Co. (1992) 3 Cal. 4th 370, 407, 11 Cal. Rptr. 2d 51, 834 P.2d 745 ; see Civ. Code § 1710(2)].

21. Promissory estoppel

Plaintiff relied on defendant's information as the seller and seller did not materialize key promises.

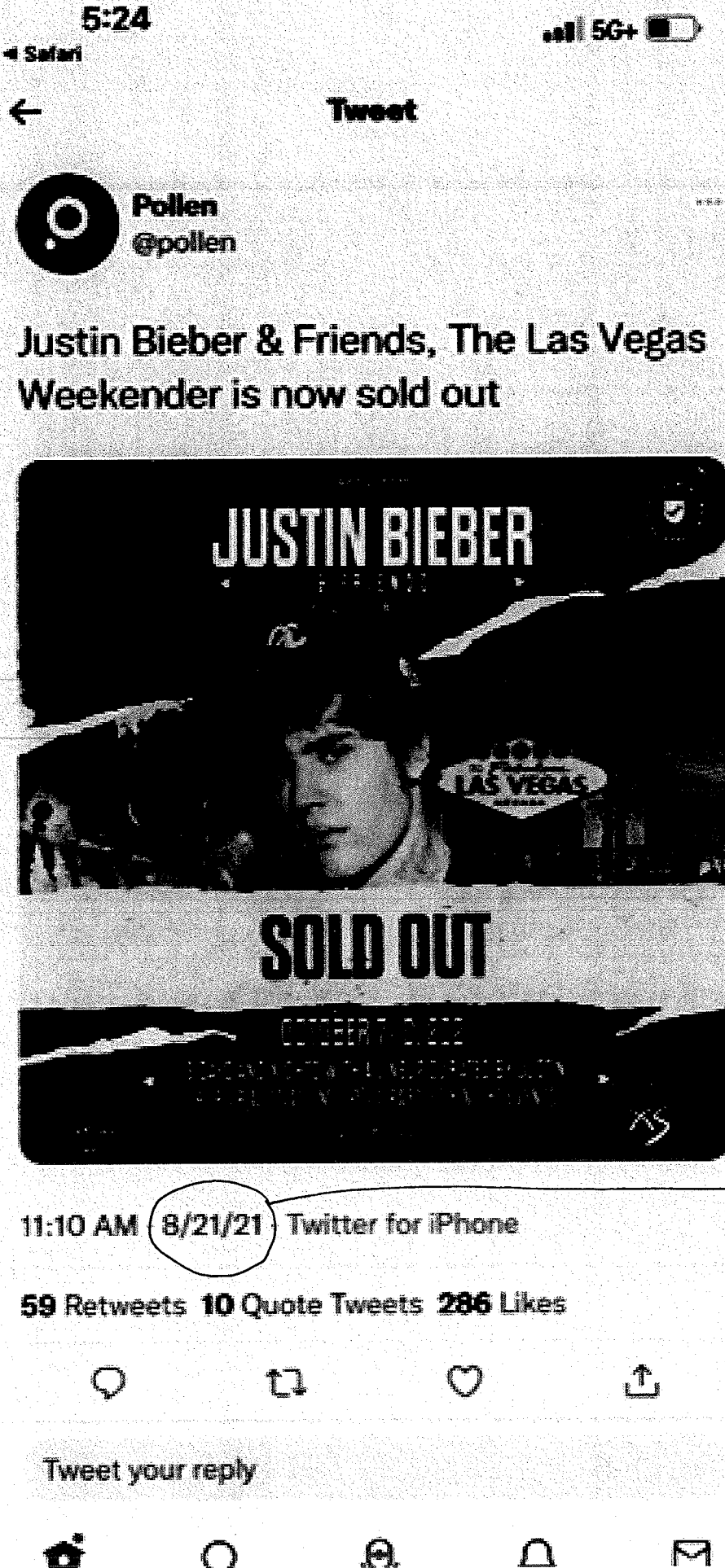
Please note that the reliance factor applies to all 21 claims listed above.

Relief/Damages

Plaintiff is seeking to recover all damages appropriately recoverable for each one of the 21 claims listed and not listed in the claims section.

This is not limited to a Refund of complete experience, all hotel expenses, transportation, airline tickets, emergency expenses, food expenses, pro se' fees, Monetary, Compensatory, Nominal and Punitive damages, restitution, equitable relief for a breach of fiduciary, punitive damages , direct and indirect damages and Reliance Damages and Expectation damages for breach of fiduciary obligation. (promissory estoppel) and Treble damages that authorizes private parties to sue for triple damages when they have been harmed by conduct that violates either the Sherman or Clayton Act.

Plaintiff also asks The court to award defendants profits resulting from the false or misleading advertising (a/k/a disgorgement), any damages sustained by the plaintiff caused by the false or misleading advertisement, and costs for a "willful violation."



August 21st 2021

Sold out

But on 9/24/21

chip Olsen sends
me email claiming
re was releasing
50 more passes.



Fraud

Chip Olsen

Email

(3000 only)
tickets

Chip Olson chip@pollen.co add...

 **Chip Olson**
To: Clover.ph@cloud.com

9/23/21

Justin Bieber & friends las vegas weekender

Hi Jole,

At one point you expressed interest in our Justin Bieber & Friends, The Las Vegas Weekender event October 7th-10th. If you or any of your friends did not secure your tickets already during the public on-sale and still want to attend this sold out event, I have great news!

We are releasing limited leftover weekend passes that were originally held back for our partners. All of our hotel packages are sold out and there are no single day tickets to this event, but you can still secure GA wristbands for all 3 days to all events and concerts for \$569 per person.

Text me back at 725-201-9668 or reply to this email before they are gone for good. These are entirely first come, first serve. Do not miss out. This event is exclusive and only 3000 tickets are being sold for the entire weekend

Best,

Chip Olson
Senior Inside Sales Agent
Chip@Pollen.co
323-741-6067
725-201-9668
767 S Alameda St, Suite 300,
Los Angeles, CA, 90021

 **pollen**

→ "only 3000
tickets are being
sold for entire
weekend!"

✍

Fraud

7:10

5G+

'Pollen'

Justin Bieber & friends las vegas weekender fix Inbox

**Chip Olson**

to Chip

Sep 24, 2021 Details

September 24th
2021

Hi again,

It looks like you attempted to purchase a weekend pass but didn't complete your booking. Are you still interested in one of these last available weekend tickets for this event? They are now sold out, but I have access to about 50 passes we held back. Do you want one?

Thanks,

Chip

Chip Olson**Senior Inside Sales Agent**Chip@Pollen.co

323-741-6067

767 S Alameda St, Suite 300,

Los Angeles, CA, 90021

www.pollen.co

AA

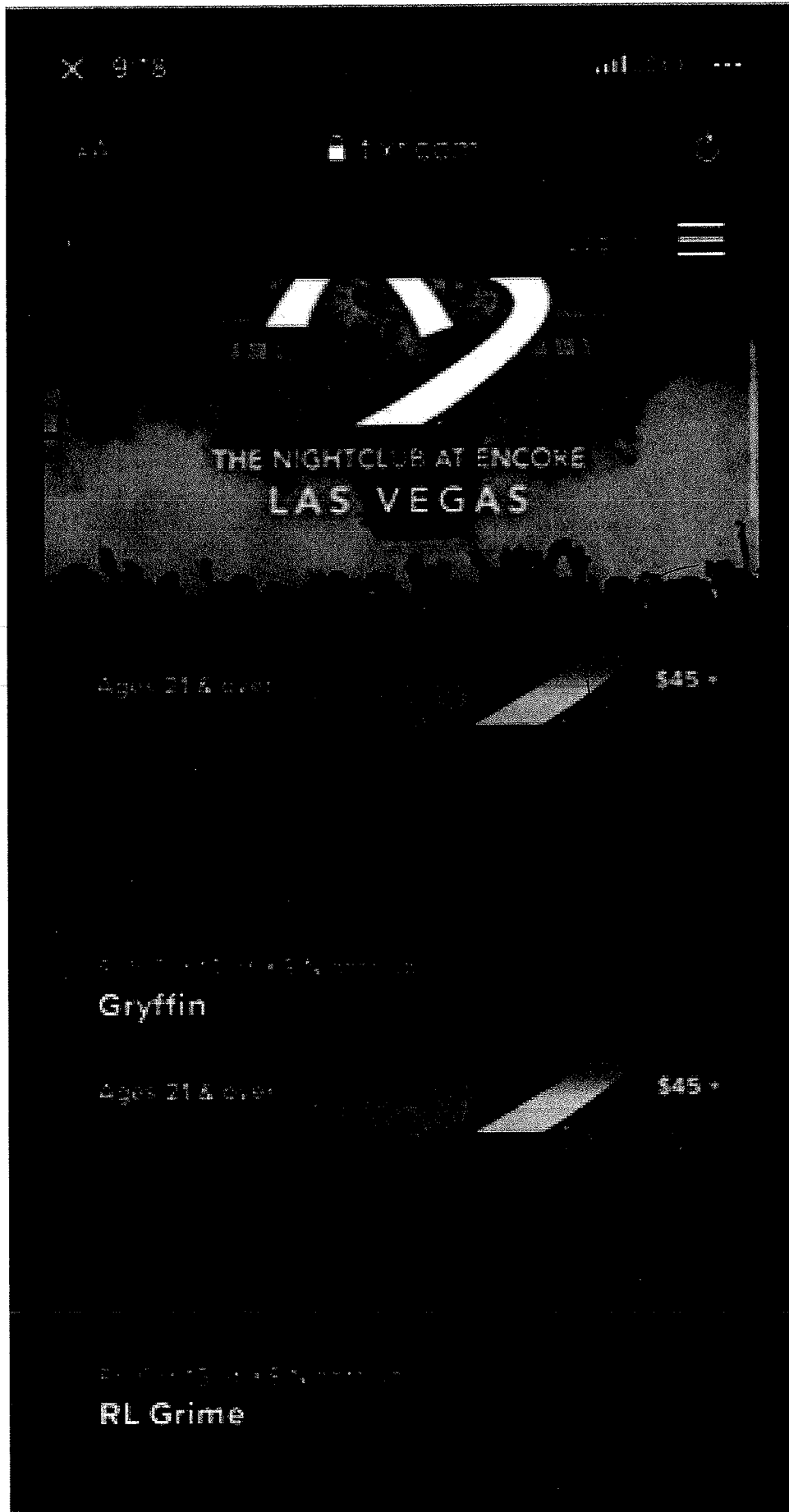
mail.google.com



Fraud

7:42

5G+



fixr.com

Sunday 10/10/2021
@ XS Nightclub
"Gryffin"
\$45.00 +
plus

VIP

Email

1

7:09

5G+

September
20th
2021

'Pollen'

Head to Justin Bieber & Friends, The Las Vegas

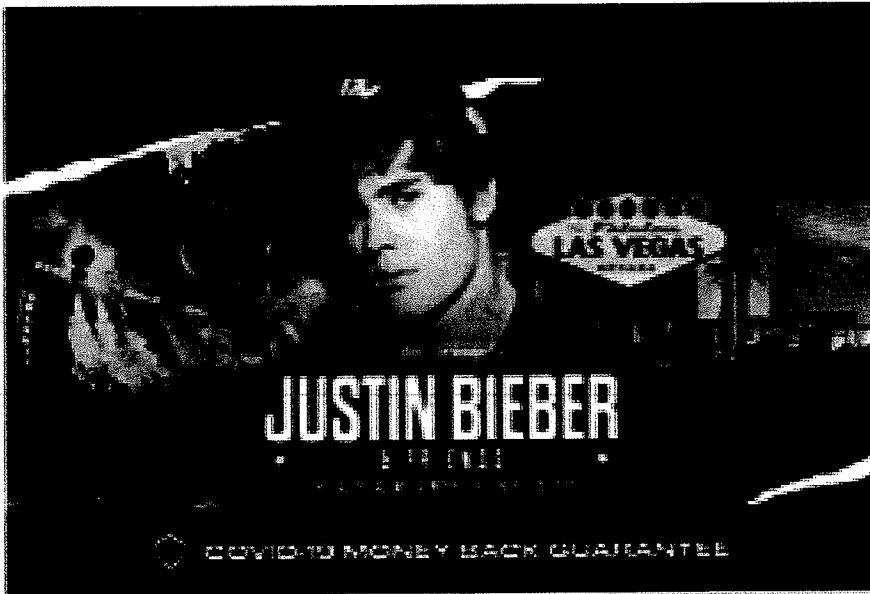
Weekender in VIP-style [inbox](#)



Justin Bieber on Pollen

to me

Sep 20, 2021 Details



pollen

October 7-10, 2021 | Las Vegas

Go VIP to Vegas

As if your experience couldn't get any better, we're releasing a fresh batch of add-on VIP upgrades. LIMITED availability, so don't wait to book!

Take a look to elevate your experience



AA

mail.google.com



VIP Email

7:09

5G+

Pollen



What's Included

- VIP priority entry at all venues
- Exclusive VIP area at all venues
- Complimentary seltzer, beer and water at XS & Encore Beach club
- On Site VIP Concierge

We also have a limited number of VIP tables on sale now.

BOOK TABLES

pollen

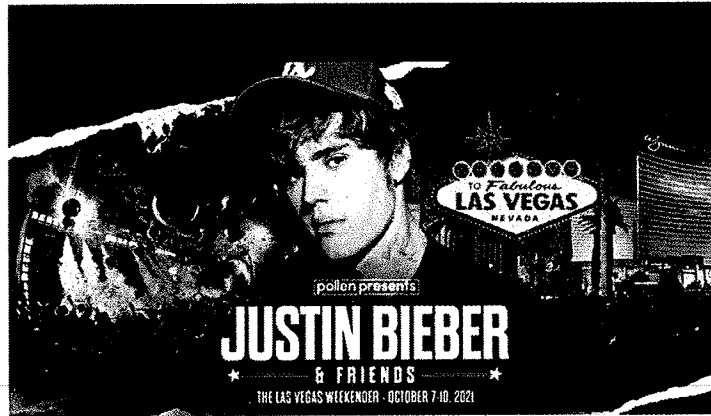
AA

mail.google.com

10/06/2021 (one day shy of event start date)
David Guetta
dropped from
line up.



to me
Oct 6, 2021 Details



October 7-10, 2021 | Las Vegas

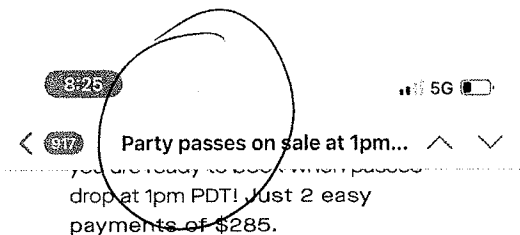
Justin Bieber & Friends starts TOMORROW!

It is with huge regret that we have to inform you that David Guetta will no longer be performing this weekend due to reasons completely out of our control. We're working to replace him and we will be announcing that shortly.

In the meantime, aside from your already packed lineup featuring Justin Bieber, Kehlani, The Kid Laroi, and Jaden Smith, you will also be partying with **Kim Lee, Lunay, Deux Twins, DJ Politik, 3LAU, Dijital, and Marc Stout!** Plus, **Carnage** will be playing at the After Party at Encore Beach Club on Friday night - you won't want to miss this!

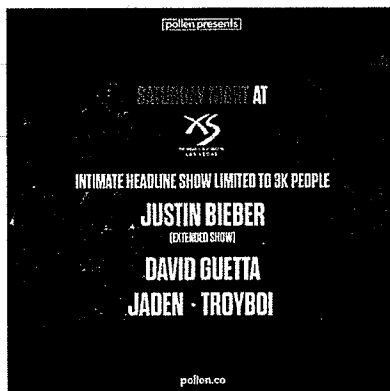
And as you know... This weekend is all about Justin Bieber and his favorite things, so we are bringing even more talent to the skatepark on Saturday. Eddie Benjamin and Sounds of Lio will be performing plus you'll get to see some of the best skaters around: Kate Hedstrom, Shane O'Neill, Jakob

Party Passes
Available?



BOOK HERE

**Everything you'll get
access to:**



VP



Blocking front stage

front row

space in between

VP Blocked

0:02 / 0:11
5 29 109

Tweet your reply

Q&A from fans to Pollen

5:25

Safari

5G+



Anja @anja_hi · 8/21/21

Replying to @pollen

When will we be able to buy the meet and greet add on?

1 1 1 1 1

) Meet and Greet



Pollen @pollen · 8/22/21

Hi Anja, thanks for reaching out. We will be sharing more details about the meet-and-greet with Justin shortly including the price. We can let you know that it will be intimate with only a small number of these available. Keep an eye out for more details from us.

1 1 3 1 1

Promises



nina | 250 @bizzleisatm · 10/10/21

Replying to @pollen

care to explain all the mess and the lies? some of us payed A LOT of money to go to see justin, he was performing for 1 HOUR and they had rich people blocking their view so some of them didn't even see him. This shouldn't be named justin bieber & friends and you know that.

1 2 15 1 1



Pollen @pollen · 10/10/21

Hi Nina, thanks for your feedback. We're sorry that the experience has not met your expectations. Your feedback is important and we will take it into account for future experiences. We hope that you enjoyed Justin's performance and the other amazing artists.

Tweet your reply



Fraud

QSA from terry to pollen
/



ronaldo_drew.005 a single price includes stay at the hotel the 3 nights??? ❤️👁️

48w Reply Send



pollen @ronaldo_drew.005 The price will include tickets and accommodation for the 4 nights.

48w 1 like Reply Send



caitlinfarrand Are tickets going to be available without hotel accommodation?

48w Reply Send



pollen @caitlinfarrand Hello, there will be no party pass tickets available. All tickets are sold with accommodation.

48w 1 like Reply Send

Fraud

CEA to Pollen
Frontier



madisonfowlerr can I go for just 1 night. it's my 21st



48w 1 like Reply Send



pollen Hi! Access to the experience will be exclusive to those who purchase the 3-day hotel package through our platform.



48w Reply Send



ronaldo_drew.005 a single price includes stay at the hotel the 3 nights??? ❤️👁️



48w Reply Send



pollen @ronaldo_drew.005 The price will include tickets and accommodation for the 4 nights.



48w 1 like Reply Send



caitlinfarrand Are tickets going to be available without hotel accommodation?



48w Reply Send



pollen @caitlinfarrand Hello, there will be no party pass tickets available. All tickets are sold with accommodation.



48w 1 like Reply Send

False / fraudulent claims
that there would be
no party pass available



k.jennifer yeah yall are taking too long to drop these prices



48w Reply Send



sarahtotterdale Is there an option of event pass only for Vegas residents?



48w Reply Send



pollen @sarahtotterdale Hi Sarah! We do not have event-only options, but please feel free to register through the link in our bio to stay updated.



48w 1 like Reply Send

"NO event only options"



false claim.



thatgirlrachellouise Is there a way for Las Vegas locals to book a package with no hotel? Don't need one!



47w Reply Send



pollen Hi @thatgirlrachellouise, this experience includes hotel accommodations and party passes (access to the event without hotels) will not be available to purchase.



47w Reply Send

"no access without ~~hotels~~"



lct004 Hi! Does the hotel package include tickets for two people?



46w Reply Send



pollen @lct004 Hey, the price includes accommodation and a party pass to access all events for each person on the booking. Please make sure to sign up to receive updates via the link in our bio! Thanks, The Pollen Team



46w Reply Send

Ambiguous and very misleading

Twitter
Complaints
VIP

8:49

5G



whit @801whit · 10/11/21

This is more on hotel security but them lining us up 4hrs early and taking away all food/drinks, telling us we couldn't sit, squat or take heels off (most of us are in heels)



whit @801whit · 10/11/21

We went to the pollen support desk at the venue and asked them why there weren't add ons and why so many things promised were missing and they told us our screenshots were photoshopped so we pulled up email proof sent from them 🤔



whit @801whit · 10/11/21

Pollen gave out COVID cleared wristbands to literally anyone who didn't have one without proof of negative test or vaccination. They just walked down the line passing them out.



whit @801whit · 10/11/21

Since the thread is getting pretty long I just want to add again: not mad at Justin or his team and all!

This has nothing to do with them and has everything to do with @pollen



whit @801whit · 10/11/21

Pollen telling fans no party passes will be

Tweet your reply





smithhtyler Is there going to be regular tickets for sale instead of the whole 3 day package?



48w 2 likes Reply Send



pollen @smithhtyler Hey Tyler! At this time this experience includes accommodations. Make sure you sign up at the link in our bio to stay up to date. More details coming soon!



48w 5 likes Reply Send



~~youre_an_asshole~~ Is Justin gonna be there for all those three dayS ??????



48w 1 like Reply Send



pollen @youre_an_asshole We'll be announcing more details on the itinerary, performances, and more for this experience soon, be sure to sign up for updates from the link in our bio!



48w 1 like Reply Send

Very unclear answers
from Pollen regarding
critical and relevant
information.



divairl Does the "2 person occupancy" mean we split the price and two tickets are included to go to events?



46w Reply Send



pollen Hi - 2 person occupancy means that the rooms can fit 2 people in them, so yes this is correct. The total cost of the package (room and tickets) will be divided between both of you!



46w Reply Send

is
Q: ~~does~~ the initial price per person or for 2 people?

False/
Switch and
vice versa
bait

:A

Emails from
Fams
7:42

Loren Cuevas

"Politen"

id: secretariat@norman-wab-wat.com

----- Forwarded message -----

From: Loren Cuevas <lcmodeling@yahoo.com>

Date: Wednesday, October 13, 2021

Subject:

To: bolobers@politen@gmail.com

They sold 45\$ tickets for the same event the same night the
same time for the opening act for 45\$ and made us pay 600\$
With the false narrative that we were seeing him for 3 days. If
we knew we were seeing him only for 1 hour we should've
payed the same price as these tickets.



image4.png



Back



Forward

AA

mail.google.com



email #: 1 of 2

Jackie Morales

7:53

5G+

Pollen

----- Forwarded message -----

From: Jackie Morales <jackiemorales08@yahoo.com>

Date: Wednesday, October 13, 2021

Subject: This is the email I sent pollen about my husbands and I experience.

To: beliebersvspollen@gmail.com

Hello,

I attended the Justin Bieber & Friends Las Vegas event and I'm very disappointed on how it went.

I also want to add all the false advertising Pollen did, they told us there would be soundcheck & Q&A I have screenshots of the email sent. Also the VIP/GA Pass that was offered at the beginning apparently never went on sale.

Another thing was the VIP, we were in a single file line and when they announced the separate line for VIP EVERYBODY ran to the front. People were pushing and shoving and I had a panic attack because I was mauled.

Pollen also said Justin Bieber was going to be at some of the events, he did not come to anything and his performance was only 1 hour long. I paid for a party pass that was \$569, I do not have that kind of money to be throwing around but I really wanted to see Justin Bieber if you all had said he's only performing Saturday I wouldn't of gotten a hotel Thursday-Monday.

Moving on to the Justin Bieber Event when we walked in

AA

mail.google.com



email # 2 of 3

Jackie Morales

7:53

5G+

'Pollen'

Moving on to the Justin Bieber Event when we walked in we were waiting in line to get checked by security, girls from the GA line ran inside and were able to successfully get front row. We had VIP for a reason we wanted closer seating but we were completely mixed in. There was also people at the tables in front of us where people were blocking the view and they did NOT have pollen wristbands. You guys let people that did not pay for Pollen wristbands get in front of us that payed for this event. It was ridiculous, people paid almost 5k for this event and we all got treated poorly.

We expect to get our full refund from this event.

My husband also paid for this event and this was one of the worst experiences we have encountered, we were lied to, yelled at and our view was blocked.

(THIS IS THE EMAIL I SENT POLLEN)

Sent from my iPhone

Just Writing...
 [Redacted]

[Redacted]

Received from [Redacted]
 [Redacted]
 [Redacted]

DBD6839A-CB78-42BB-...

[Redacted]

[Redacted]

AA

mail.google.com



email #

Ceara Knoll

7:40

5G+

'Pollen'

----- Forwarded message -----

From: Ceara Knoll <cearaknoll@gmail.com>

Date: Wednesday, October 13, 2021

Subject: Scam event

To: beliebersvspollen@gmail.com

Firstly, it was highly promoted that this was going to be a up close and personal event all weekend with Justin Bieber. That was the first lie told. No communication with us where VIP would be or that we needed to go somewhere special for our VIP bands. We went to the premiere documentary and when we got there we did not get a seat or anything they stated in the email. It was completely booked out and had to stand to enjoy the documentary. After the documentary we went to XS and admittedly had a line next to GA, I noticed that Ga was getting in faster than VIP and that was because they had two sections open for XS security to check their stuff and check their bodies but for VIP there was only one. Instantly annoyed we got through but was not clarified where vip went or where the stage would be for the main performance, so we went to the outside part but was instantly blocked by those vip tables so we moved inside to have a better view and noticed a lot of people didn't have the pollen event bands on like we did and I asked one girl and she said that they sold these separately through Wynn. We had to provide negative Covid tests or Covid vaccinations to get a clear band and was told this was the only way into the event but found out we were mixed with people who weren't checked and some people have now caught Covid.

AA

mail.google.com



7:40

5G+

Pollen

On Friday at the beach event I spoke to two pollen employees about the situation the night before and the tables blocking our view and they said they didn't know but it would be better.

Saturday we went to the skate park to see the photo wall of Justin and listening station, plus Justin's favorite food and merch. None of that was provided and they had limited amount of merch so unless you were first in line you didn't get much. We went back to the hotel and got ready and went to line up around 5ish/6 and was automatically turned away. So I instantly went to talk to Pollen because I wanted to know how tonight would go and where Justin would be performing. They said outside. I asked if those tables would be in the way like before and they stated no and had showed us pictures that they wouldn't be there. I asked if vip would be let in first they said yes but it wasn't the case. After hours of waiting around the hotel XS staff finally aloud us to line up but it was a hectic mess, people running being yelled at and threatened to be kicked out, I was separated from my friend and wasn't aloud to be with her, we lined up down their halls and for hours we weren't allowed to sit, take our heels off, eat or drink. VIP and Ga were mixed together until the very end. Finally when the lines were spilt I noticed GA was in the VIP line and no one was really checking anything. GA was completely in another section being let through first as VIP was still stuck down the hall way. We get into the event finally and we're outside and noticed the tables were there and being set up so we tried to go inside but they weren't allowing us to do so. My friend who is a lot shorter than me wasn't even able to see Justin not once without a phone. We paid over 1k for hotel, ticket and travel for this scam.

AA

mail.google.com



Email #

Gia Tjortjis

7:40

5G+

'Pollen'

----- Forwarded message -----

From: **Gia Tjortjis (tagiat)** <gtjortjis@gmail.com>

Date: Wednesday, October 13, 2021

Subject: Pollen Statement

To: beliebersvspollen@gmail.com

This is my official statement.

My name is Giannoula Tjortjis and I attended the Justin Bieber and Friends Las Vegas Weekender in Las Vegas October 7th-9th, 2021.

When I had originally booked for this event/experience I had just purchased the hotel package for the Linq hotel on August 23, 2021. I personally chose the Linq because it was the cheapest hotel package that I could get. to help make the trip more affordable I decided to go with their payment plan which included \$499 down and then paying the other two equal payments. However this was not the best plan, considering that two days later we had to pay the \$388, and then a month later paid the additional \$388. pollen seem to have no issues taking out the money from my account.

On September 17th, 2021, I received an email from Pollen informing me know that they had complementarily upgraded my hotel from the Linq hotel to the Wynn and Encore which was where the event will take place. They had said that no further action was needed inside the email and had also attached a link in regards to information about the hotel which I had noticed included a \$45 resort fee for

AA

mail.google.com



Email #:

Chia Torgio

7:41

5G+

'Pollen'

After the movie, at approximately 11PM, was the kickoff show at XS Nightclub. It included Lunay & Kehlani performing as well as some EDM dj's. According to Nevada's mask mandate, masks are required in all indoor settings, however inside of XS nightclub nobody was wearing a mask and the club was packed. Everything else went fine for that part.

The next day on Friday, October 9, 2021 was the pool party at Encore Beach Club which was supposed to be exclusive for attendees of the Justin Bieber and Friends Las Vegas Weekender. The pool party had absolutely nothing to do with Justin Bieber and had total random people who were not even attendees for the event, coming into the pool party. Not to mention the lack of seating for attendees. 75% of the pool party was to reserve seating ranging from \$3000-\$20,000 , and many of those seats going unused. The Kid Laroi performed, as well as Jaden Smith, but their setlists were incredibly short. I would also like to mention the outrageous prices of the food and drinks available at the hotel, they had very tiny water bottles of Fiji water for \$14 a bottle, and then they also had a dozen chicken tenders for \$75. Absolutely outrageous.

The pool party was supposed to end at 6PM and after that they were having a "secret after party" which ended up being at the Encore Beach Club again. I personally did not attend this event because from what I had heard, it was extremely unplanned and unprepared, and totally last minute, so I did not deem it worthy of attending, so I just remained in my hotel room for the rest of the evening.

AA

mail.google.com

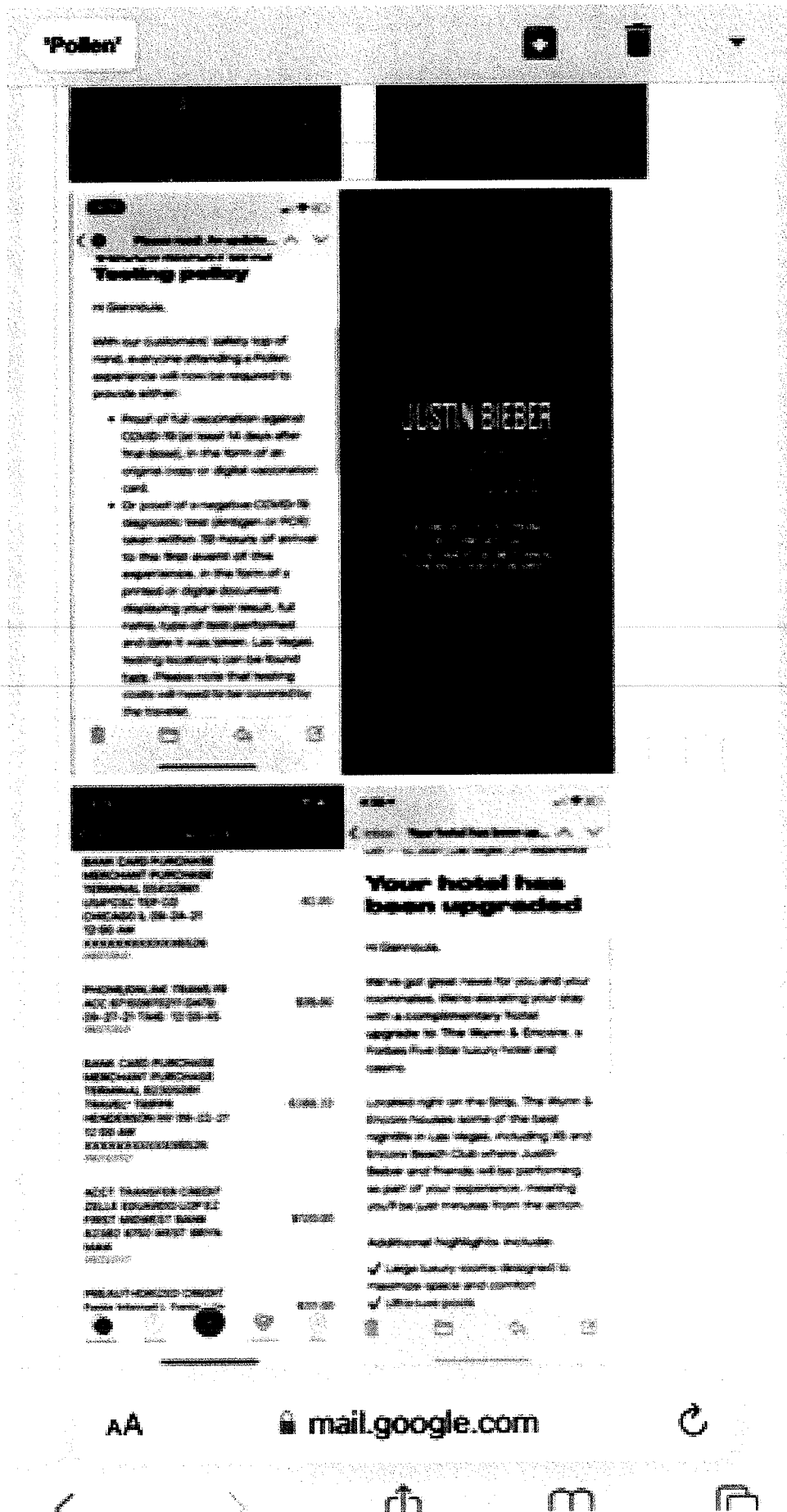


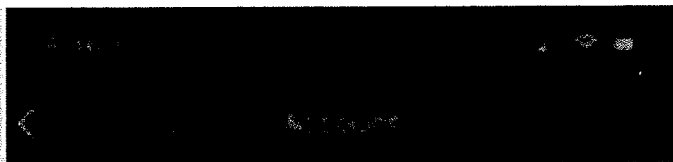


Dina Jorgulis

7:41

5G+





08/23/2021

PREAUTHORIZED CREDIT
 Fenix Internet L Fenix Inte
 210824
 08/24/2021

\$39.00

BANK CARD PURCHASE
MERCHANT PURCHASE
TERMINAL 82305091
TRAVEL* TRIPPR
HENDERSON NV 08-23-21
12:00 AM
 XXXXXXXXXXXXXXX526
 08/23/2021

-\$388.33

BANK CARD PURCHASE
MERCHANT PURCHASE
TERMINAL 82305091
TRAVEL* TRIPPR
HENDERSON NV 08-20-21
12:00 AM
 XXXXXXXXXXXXXXX526
 08/23/2021

-\$499.00

PHONE/ONLINE TRANS FR
ACC 07103970211 DATE:
08-21-21 TIME: 19:39:29
 08/23/2021

\$6.00

PREAUTHORIZED CREDIT
 DEYDAI TOANCEED

\$70.50



RECEIVED

RECEIVED

RECEIVED

RECEIVED

4:38

< inbox Your hotel has been up... >
 LOT 7 - LAS VEGAS | LAS VEGAS | 21st experience

Your hotel has been upgraded

Hi Giannoula,

We've got great news for you and your roommates. We're elevating your stay with a complimentary hotel upgrade to The Wynn & Encore, a Forbes Five Star luxury hotel and casino.

Located right on the Strip, The Wynn & Encore houses some of the best nightlife in Las Vegas, including XS and Encore Beach Club where Justin Bieber and friends will be performing as part of your experience, meaning you'll be just minutes from the action.

Additional highlights include:

- ✓ Large luxury rooms designed to maximize space and comfort
- ✓ Ultra-luxe pools



→
 ripper
 abundant
 roof

VIP

Twitter
witness/
complaints

8:50

Safari

5G

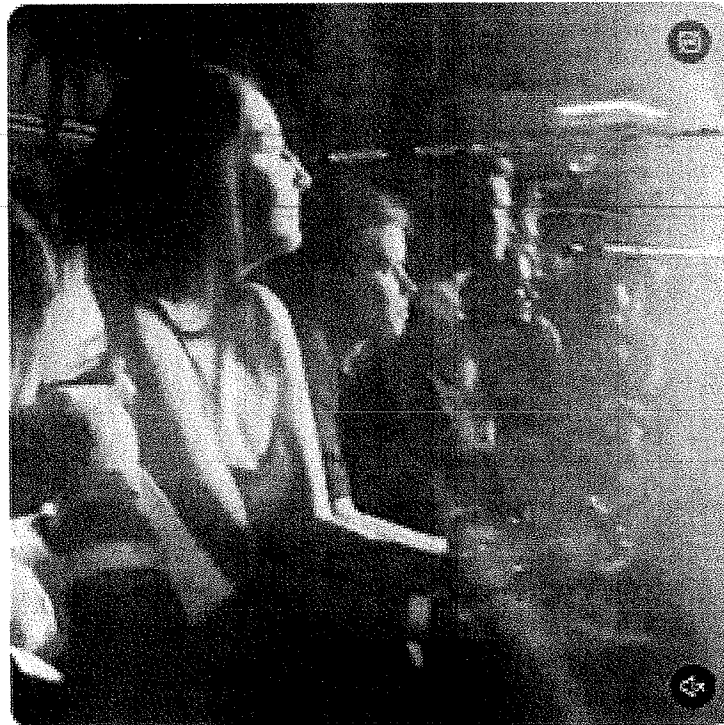


Tweet



morgan
@bieberscoups

Just so you guys can understand. This is VIP/GA and the people in front of us have SEATS but are sitting on top of them so now we can't see and staff can't make them move so..let's hope justin crowd surfs 🙄🙄🙄



4,111 views

Tweet your reply



Fan Emails

Whitney Bonnema

1 of



Whitney Bonnema

wbonnema@vineyardsmg.com

Hide details

To:



beliebersvspollen@gmail.com

Date: October 13, 2021, 7:08 PM

This message has been modified to fit your screen. Tap here to show original.

My name is Whitney Bonnema and I attended the Justin Bieber and Friends event the weekend of October 7-10 hosted by a company named Pollen. I went into this event thinking it would be a three-day event with Justin Bieber and geared to Justin Bieber fans based on advertisements. I left the event completely mistaken.

To start from the beginning Pollen release hotel packages for the weekend that came with access to all events. When these went on sale, they sent out messages saying, "there would not be any single passes or party passes and hotel packages would be the only tickets released to this event", therefore causing fans to purchase hotel packages for more money. I waited, and they ended up later releasing party passes when they said they would not.

I purchased two party passes (\$569 each) that got me into the three-day event. I then later purchased VIP upgrades (\$350 each) which guaranteed me "VIP priority entry at all venues, Exclusive VIP area at all venues, Complimentary seltzer, beer and water at XS & Encore Beach club, On site VIP Concierge."



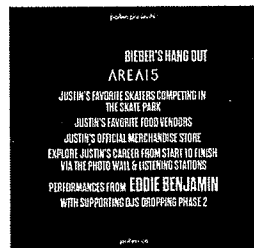
Whitney Bonnema

Primary

was advertised when it comes to the VIP upgrades. VIP did not have its own entrance at every event like stated, in fact for the main event VIP was let in through the same entrance and at the same time as GA. The only thing VIP got me was free seltzer, beer, and water (that is when they were not out) but I did not pay \$350 a person for seltzer beer and water.

Secondly, we received a message from Pollen saying VIP would have front row views. When we got to the club, we realized this was not the case and that they sold club tables that were put right in front of the barricade where GA and VIP were. The tables were placed on a stage making them taller than us, so there were no "front row view" let alone any views at all. VIP was a huge scam and they did not deliver what they advertised in full.

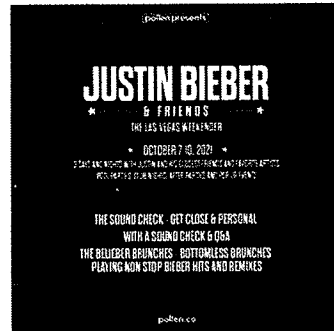
Next, they advertised an event called Area 15 which would be "Justin's favorite skaters, Justin's favorite food vendors, Justin's official merchandise store, a wall of Justin's career from start to finish, a listening wall, and performances". They did not have Justin's favorite food vendors or a wall of Justin's career from start to finish or a listening wall at Area 15 and they did not add anything to compensate for it. They had one bar, one food truck, skaters, and a performance.



Fan
Emails

Whitney Bonnerma

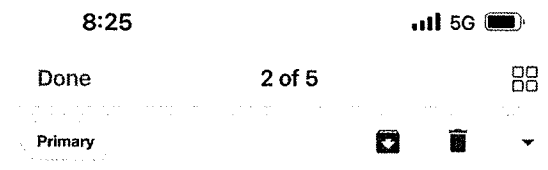
check, and a QR. None of these add-ons ended up being released.



Next, they advertised the event as a "Three-day weekend with Justin", they also sent out messages saying Justin would be in attendance at several events over the weekend - Justin was only in Vegas for a total of four hours for his concert (his concert only lasted 1 hour as well) and that is it.



Whitney Bonnema



I have inserted all of my personal screenshots that I took. I know others have screenshots, videos and pictures that back up the other things I shared.

Overall, I believe that we were a victim of false advertisement. I would say only half of the things Pollen advertised were available at the event over the weekend. It is definitely not what I and many other thought we purchased.

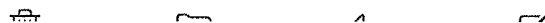
Thank you,

Whitney Bonnema 1801-633-3106 | Twitter: @801Whit

B **Beliebers Vs Pollen**
----- Forwarded message ----- From:
Whitney Bonnema <wbbonnema@vineyard.com>

B **Beliebers Vs Pollen**
Scott will reach out later today

B **Beliebers Vs Pollen**
to Jolieebailon
4 days ago Details



6:46

5G+

← Thread

Open app



Tweet your reply

Reply



Justin Bieber @justinbieber · Aug 19, 2021

Replying to @justinbieber



David Guetta and 3 others

385

2,472

15.5K

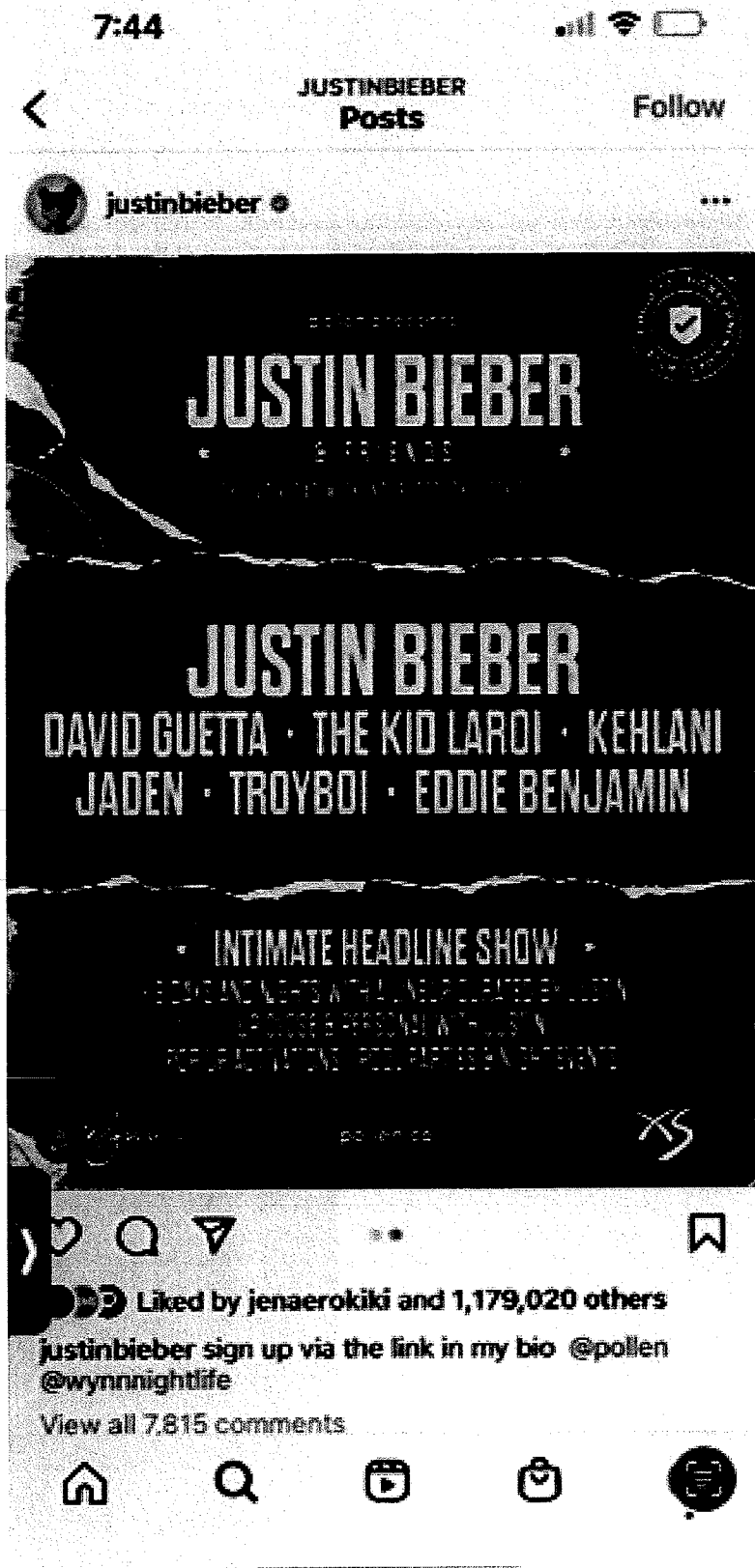


AA

twitter.com



Promotional Material



7:44



Promotional
Material



~~@wenn~~

~~@wenn It's crazyyyy she had a push to
start too~~

UP CLOSE AND PERSONAL
WITH JUSTIN BIEBER



Liked by jenaerokiki and 1,179,020 others

justinbieber sign up via the link in my bio @pollen
@wynnnightlife

View all 7,815 comments



7:43



Promotional
Material
B



Lol Girl it's tooo early I miss sleeping so much

AN INTIMATE HEADLINE SHOW



Liked by jenaerokiki and 1,179,020 others

Justin Bieber sign up via the link in my bio @pollen
@wynnnightlife

View all 7,815 comments

toldbylens We can't wait

pollen How @andrius7 william 01 with the Justin



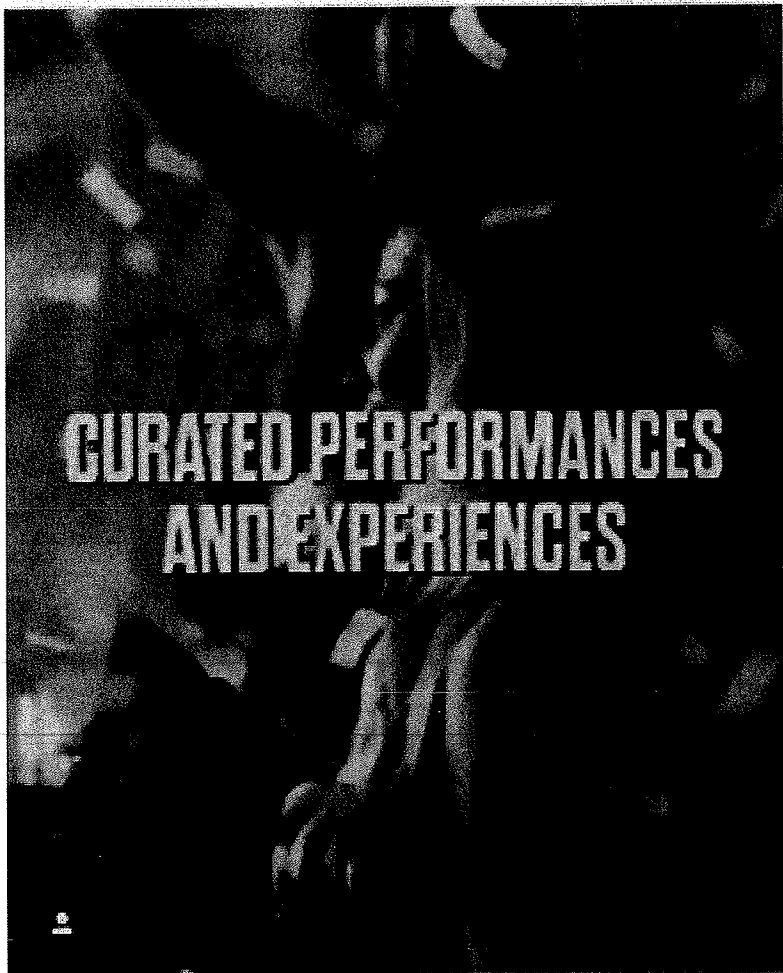
7:43



JUSTINBIEBER
Posts

Follow

Promotional
Material
(B)



Liked by jenaerokiki and 1,179,020 others

Justinbieber sign up via the link in my bio @pollen @wynnnightlife

View all 7,815 comments

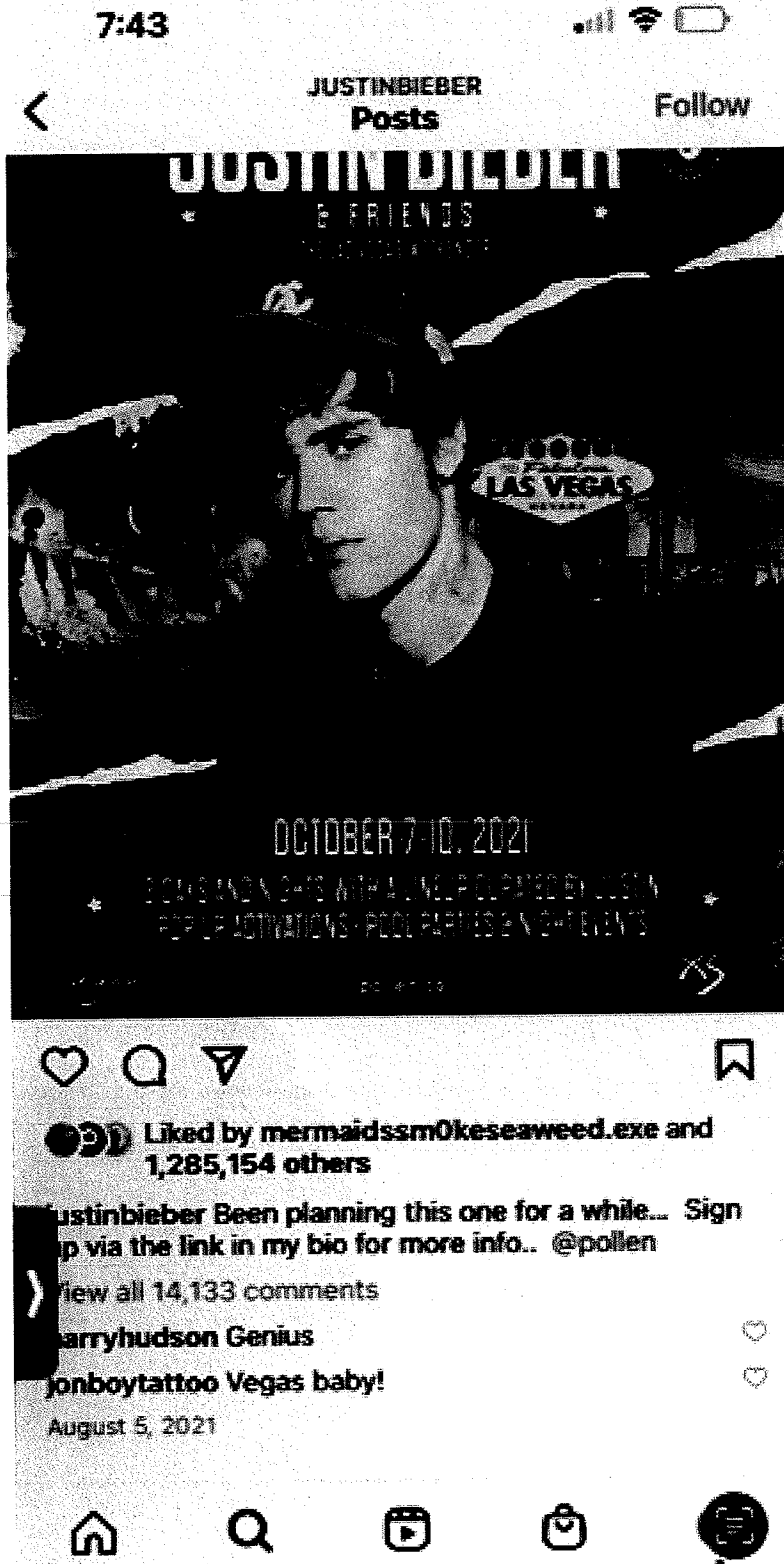
toldbylens We can't wait

pollen How incredible william 01 with the Justin





Promotional
Material (B)
video
screenshots



Promotional
Material
B

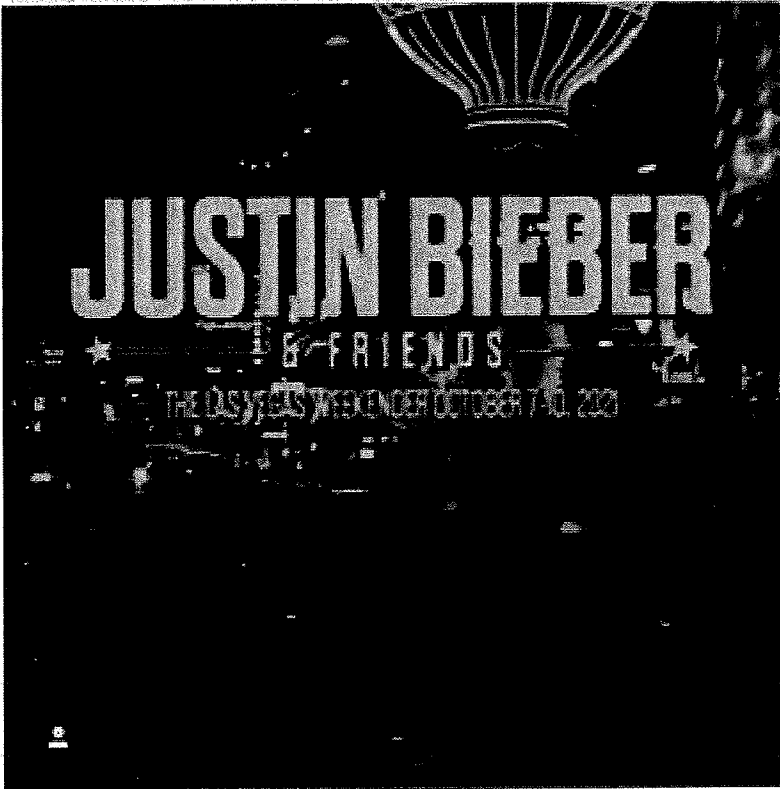
7:43



JUSTINBIEBER
Posts

Follow

Promotional
material (B)



Liked by jenaerokiki and 1,179,020 others

Justinbieber sign up via the link in my bio @pollen @wynnnightlife

View all 7,815 comments

oldbylens We can't wait

> pollen Hey @rodriguez_william_01, with the Justin Bieber & Friends experience in high demand, we do not allow resales as per our policy. You are, however, allowed to transfer your booking to a friend. If you can DM us with your booking [...]

August 19, 2021



7:07

5G+

'Pollen'

Your Justin Bieber & Friends, The Las Vegas Weekender trip is reserved until 15:17 PM, EDT on Fri 20 August / 12:17 PM, PDT on Fri 20 August [Inbox](#)



Justin Bieber & Friends, The Las Vegas ...

to me

Aug 20, 2021 [Details](#)

August 20th 2021

Virtual
Waiting Room

Nice one Jolie! Your Justin Bieber & Friends, The Las Vegas Weekender trip is reserved until 15:17 PM, EDT on Fri 20 August / 12:17 PM, PDT on Fri 20 August.

At least one person in your group must make a payment in the next ten minutes using this link to secure the reservation:

Once one person has made a payment, you will have one day for everyone in the group to pay their share. If your whole group doesn't check out in time, any payment made will be refunded, and your reservation canceled.

Don't forget: each of your friends just needs to pay a \$499 deposit.

AA

mail.google.com



7:07

5G+

'Pollen'

YOUNG & RUBICAM

Book with confidence: If the trip is cancelled due to COVID-19 restrictions, we will reschedule. If you are unable to attend the rescheduled date, you will receive a 100% refund. Full details in our [FAQs](#) and booking conditions.

If you have any questions, please contact us via support.us@pollen.co.

pollen

AA

mail.google.com



7:08

5G+

'Pollen'

Jolie don't let anyone miss out on Las Vegas! 🎉

Inbox



Justin Bieber & Friends, The Las Vegas ...

to me

Aug 22, 2021 Details

August 22 2021

recruiting
more
fans.

**Hey Jolie, know anyone else who wants to
escape to Las Vegas?**

There's still time! Don't let anyone miss out on
the trip of a lifetime.

Our stress-free booking process keeps things
simple. Let your friends know they just need a
\$499 deposit to hold their spot, and the rest of
the cost can be split into monthly installments.

WAKE MORE FRIENDS

**Book with confidence: If the trip is cancelled
due to COVID-19 restrictions, we will**

AA

mail.google.com



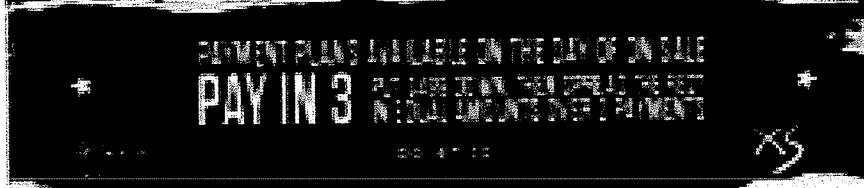
Promotional Email

7:07

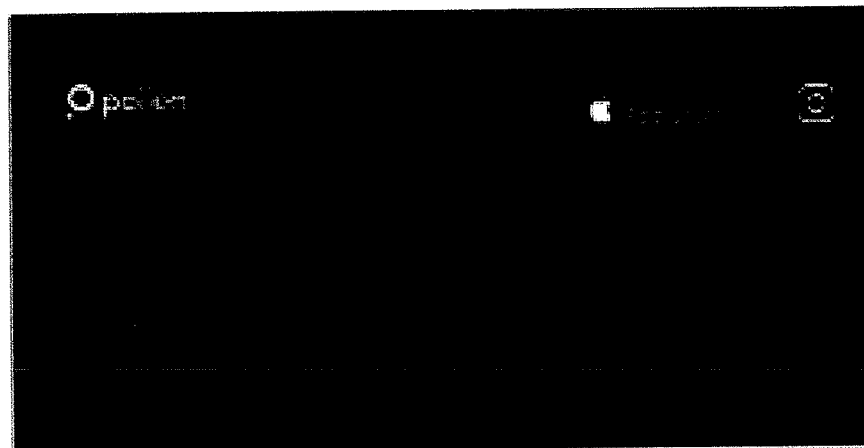
5G+

Pollen

*All bookings placed after today are pay in full.



Questions on how to book your experience? Check out our Booking Guide for more details!



AA

mail.google.com



Justice Tour 2022
Receipt

7:27

5G



My Receipt

Print Receipt

Justin Bieber

Thu - Mar 31 - 7:30 PM -

Prudential Center - Newark, NJ

Official Platinum

Sec C, Row 17, Seat 1

USD \$654.00

Fees

USD \$7.00 (Order Processing Fee)

USD \$96.80 (Service Fee)

Ticket Delivery

eTickets

Free

USD \$757.80

Billing Information

AA

my.ticketmaster.com



could not
Paid only over
\$757.80
compared to
\$10.00
Photos
moving on

7:27

5G

Ticketmaster
Justice Tour
2022
Newark

My Receipt

USD \$757.80

Billing Information

Order

9-27192/PHI

Order Date

Wed, Mar 30, 2022

Name

JOLIE BAILON

Payment Info

VISA ****2348

USD \$757.80

Billing Address

~~XXXXXXXXXX~~ street
BRONX, NY ~~XXXXXX~~

Justice
2022
Newark Tour

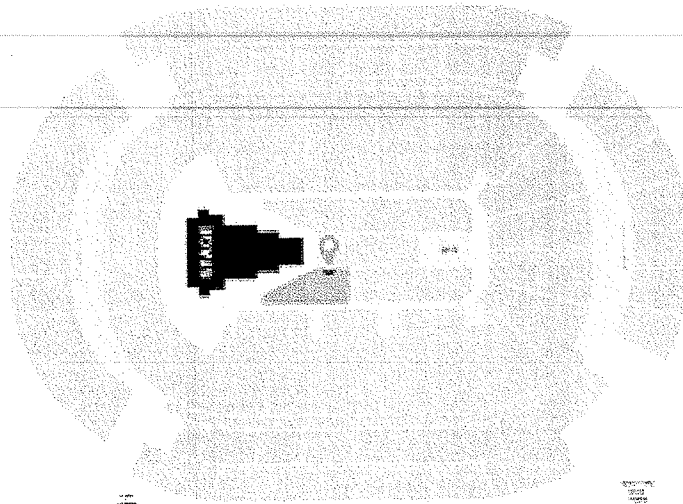
7:27

5G

X

Map View

Section C, Row 17, Seat 1





Justin
Justice Tour
2022
Newark
07/31/2022

Section C
Row 3
Seat 1
No zoom!
\$750
compared to
\$10,000
x
①

7:28

5G

justicetour 22



So close for
only
\$750
and 1 hour
away from
home!

when i tell you i loved
being in front of this
crowd like the energy
was a dream

03/31/2021
Justice Tour
2020
Newark

(2)

7:29

53

just etowle 73



Justin
Just etowle
Newark
03/03/2021

7:28

all 50

justicetour 23 100



BABY

Justin
03/31/2000
Justice Tour
2000
Newark

when i tell you i loved
being in front of this
crowd like the energy
was a dream

7:29

5G

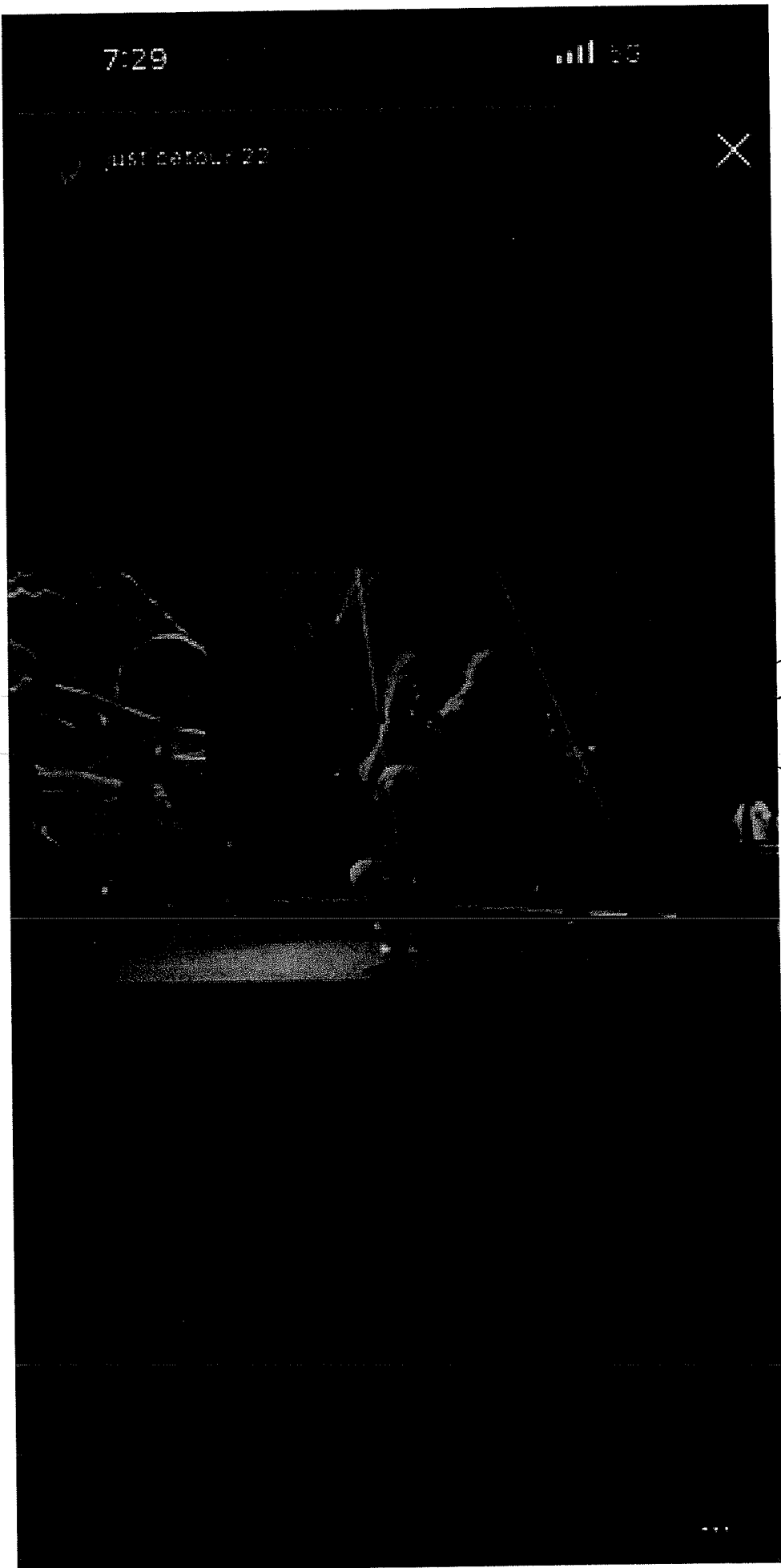
JUSTICE TOUR 22



Justice Tour
2020
6/23/2020
Newark
no zoom!

justin so fione

5



Justin
no zoom
03/31/2021
Justice Tour
2022
Newark

⑥

7:28

all 99

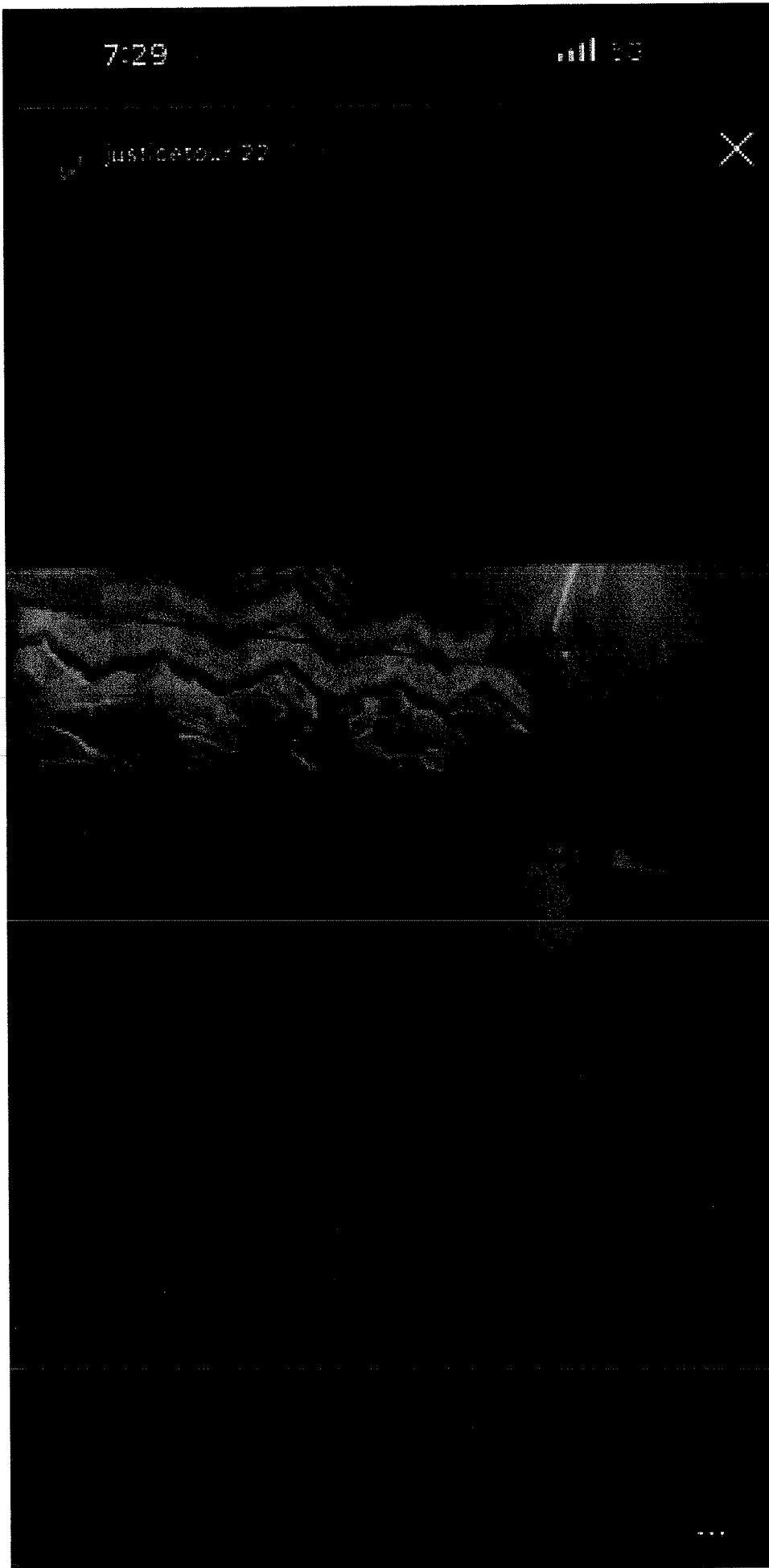
justicetour 22 10%



clearly
was a
great
experience
and up close
and personal!

when i tell you i loved
being in front of this
crowd like the energy
was a dream

Justice Tour
2022
Newark
03/31/2021



03/31/2021
Justice Tour
2020
Newark

Justin

NO zoom!

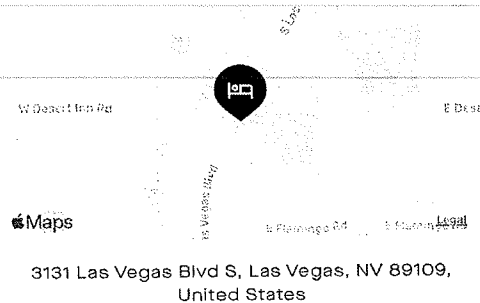
8

Itinerary /
Receipts



You're staying at
Wynn & Encore - Las Vegas

Check-in open from 3pm



Confirmation number

#24870729

DIRECTIONS



Itinerary

9:04

5G

Justin Bieber & Friends, The Las Vegas Weekender

[Booking details](#)

Get ready

Thu
7

Fri
8

Sat
9

Sun
10

12 PM



12pm - 6pm

**Justin Bieber & Friends
Skate Park Pop Up**

AREA15 - A Lot

10:30 PM



10:30pm - 4am

**Justin Bieber Headline
Show**

XS Nightclub



Have any questions?

Hinerary

9:04

5G



Justin Bieber & Friends, The Las Vegas Weekender

[Booking details](#)

Get ready

Thu
7

Fri
8

Sat
9

Sun
10

11 AM



11am - 6pm

**Justin Bieber & Friends
Pool Party**

📍 Encore Beach Club



Have any questions?

Get in touch on our 24/7 chat

START A CHAT



Itinerary

9:03

5G



#24870729

**Wynn & Encore -
Las Vegas**



8 PM

8pm - 10:30pm



**Amazon Presents
Justin Bieber: Our
World Private
Screening**

📍 Encore Beach Club

10:30 PM

10:30pm - 4am



**Justin Bieber & Friends
Kickoff Party**

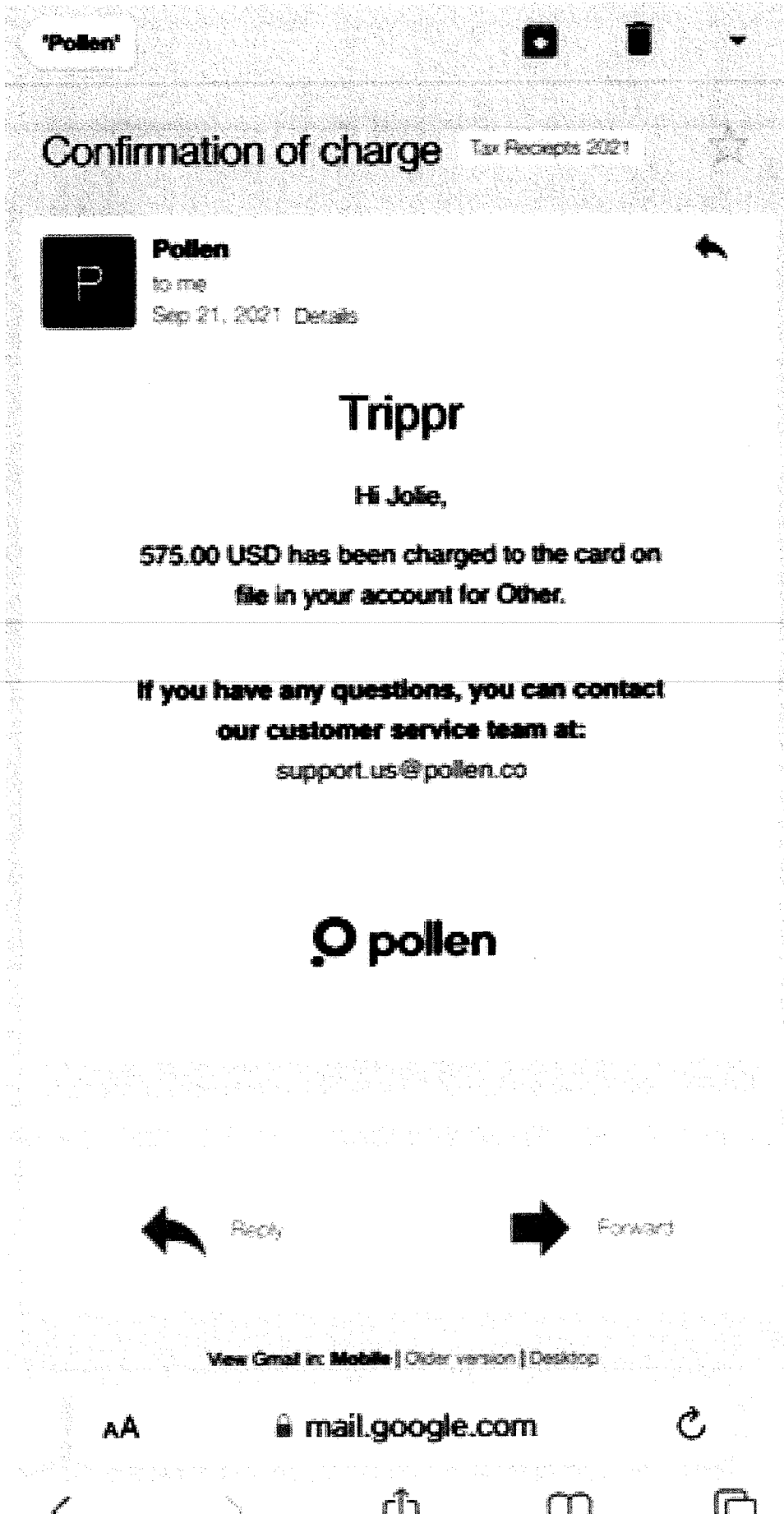
📍 XS Nightclub



Receipts

7:10

5G+



Your receipt from Airbnb

Receipt ID: RGSS84KANN - October 11, 2021

Las Vegas**1 night in Las Vegas**

Mon, Oct 11, 2021 - Tue, Oct 12, 2021



Private room · 2 beds · 1 guest

Hosted by EProNet Vacation Club

Confirmation code: HM3S2SQFAH

[Go to itinerary](#) [Go to listing](#)

Traveler: Jole Bailon

Cancellation policyCancel before 3:00 PM on Oct 11 and only get a refund of the cleaning fee. [More details](#)

Cutoff times are based on the listing's local time

Price breakdown

\$195.00 x 1 night	\$195.00
Service fee	\$27.53
Total (USD)	\$222.53

Payment

Apple Pay	\$222.53
October 10, 2021 8:20:23 PM EDT	
Amount paid (USD)	\$222.53

Have a question?[Visit the Help Center](#)**Airbnb service fee**Includes applicable VAT charges. [Go to Payment Details to view VAT invoice](#)**Airbnb Payments, Inc.**

Airbnb Payments is a limited payment collection agent of your Host. It means that upon your payment of the Total Fees to Airbnb Payments, your payment obligation to your Host is satisfied. Refund requests will be processed in accordance with: (i) the Host's cancellation policy (available on the Listing); or (ii) Airbnb's Guest Refund Policy Terms, available at www.airbnb.com/terms. Questions or complaints: contact Airbnb Payments, Inc. at +1 (844) 234-2500.

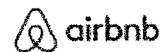
Security Deposit

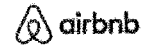
Your Host requires a Security Deposit of \$100.00 to book this listing. The Guest is responsible for the amount of the Security Deposit, but it will not be charged unless the host makes a claim. Hosts can make a claim on the deposit within 14 days of your checkout date or before the next guest checks in, whichever is earlier. If a claim is initiated, Airbnb Customer Service will be in contact with both you and your Host to make sure both parties are represented fairly. Additional details regarding the Security Deposit are available at <https://www.airbnb.com/help/article/140>

Payment processed by:


Airbnb Payments, Inc.
888 Brannan Street, San Francisco, CA 94103

Airbnb, Inc.
888 Brannan St, San Francisco, CA 94103
www.airbnb.com



Your receipt from Airbnb

Receipt ID: RCAAT9CPSW - August 19, 2021

<p>Las Vegas</p> <p>4 nights in Las Vegas</p> <p>Wed, Oct 6, 2021 → Sun, Oct 10, 2021 </p> <p>Entire home/apt · 2 beds · 1 guest</p> <p>Hosted by One Fine BnB LLC</p> <p>Confirmation code: HMBMCNSF2D Go to itinerary · Go to listing</p> <p>Traveler: Jolie Bailon</p> <p>Cancellation policy Cancel within 48 hours of booking and get a full refund, minus the service fee</p> <p>Have a question? Visit the Help Center</p>	<p>Price breakdown</p> <table> <tr> <td>\$211.50 x 4 nights</td><td>\$846.00</td></tr> <tr> <td>Cleaning fee</td><td>\$105.00</td></tr> <tr> <td>Service fee</td><td>\$134.26</td></tr> <tr> <td>Total (USD)</td><td>\$1,085.26</td></tr> </table> <p>Payment</p> <table> <tr> <td>VISA **** 5971</td><td>\$557.26</td></tr> <tr> <td colspan="2">August 19, 2021 2:10:00 PM EDT</td></tr> <tr> <td>Amount paid (USD)</td><td>\$557.26</td></tr> </table>	\$211.50 x 4 nights	\$846.00	Cleaning fee	\$105.00	Service fee	\$134.26	Total (USD)	\$1,085.26	VISA **** 5971	\$557.26	August 19, 2021 2:10:00 PM EDT		Amount paid (USD)	\$557.26
\$211.50 x 4 nights	\$846.00														
Cleaning fee	\$105.00														
Service fee	\$134.26														
Total (USD)	\$1,085.26														
VISA **** 5971	\$557.26														
August 19, 2021 2:10:00 PM EDT															
Amount paid (USD)	\$557.26														

Airbnb service fee

Includes applicable VAT charges. Go to Payment Details to view VAT invoice.

Airbnb Payments, Inc.

Airbnb Payments is a limited payment collection agent of your Host. It means that upon your payment of the Total Fees to Airbnb Payments, your payment obligation to your Host is satisfied. Refund requests will be processed in accordance with: (i) the Host's cancellation policy (available on the Listing); or (ii) Airbnb's Guest Refund Policy Terms, available at www.airbnb.com/terms. Questions or complaints: contact Airbnb Payments, Inc. at +1 (844) 234-2500.

Security Deposit

Your Host requires a Security Deposit of \$350.00 to book this listing. The Guest is responsible for the amount of the Security Deposit, but it will not be charged unless the host makes a claim. Hosts can make a claim on the deposit within 14 days of your check-out date or before the next guest checks in, whichever is earlier. If a claim is initiated, Airbnb Customer Service will be in contact with both you and your Host to make sure both parties are represented fairly. Additional details regarding the Security Deposit are available at <https://www.airbnb.com/help/article/140>.

Payment processed by:

Airbnb Payments, Inc.
888 Brannan Street, San Francisco, CA 94103

Airbnb, Inc.
888 Brannan St. San Francisco, CA 94103
www.airbnb.com



6:54



Search



Your payment details

Las Vegas

4 nights in Las Vegas

Wed, Oct 6, 2021



Sun, Oct 10, 2021

Entire home/apt · 2 beds · 1 guest

Confirmation code: HMBMCNSF2D



Payments

Payment 1 of 2

\$557.26

Aug 19, 2021 · 02:09PM EDT

VISA · ··· 5971

[Get Receipt](#)

Payment 2 of 2

\$528.00

Sep 13, 2021 · 12:31PM EDT

VISA · ··· 5971

[Get Receipt](#)

Amount paid (USD)

\$1,085.26

6:55

Search



Your payment details

Las Vegas

5 nights in Las Vegas

Wed, Oct 6, 2021

Mon, Oct 11, 2021

Private room · 2 beds · 1 guest

Confirmation code: HMXHEPYC4



Payments

5 nights in Las Vegas

\$890.93

Aug 13, 2021 · 01:50PM EDT

VISA --- 2117

[Get Receipt](#)

Payment

\$806.00

Sep 21, 2021 · 07:38PM EDT

MASTERCARD --- 4625

[Get Receipt](#)

Amount paid (USD)

\$1,696.93

7:22

5G

Spirit ...

**YOUR CONFIRMATION
CODE****ACQHHP**

Booking Date Wednesday, October 13, 2021

Flight

FRIDAY, OCTOBER 15, 2021	TIME	DURATION
Las Vegas, NV	8:10 PM	02 h 37 min
Dallas Fort Worth, TX	12:47 AM+	
FLIGHT	TERMINAL	
208	1	

Change Aircraft

SATURDAY, OCTOBER 16, 2021	TIME	DURATION
Dallas Fort Worth, TX	8:25 AM	03 h 41 min
New York, NY - LaGuardia	1:16 PM	
FLIGHT	TERMINAL	
718	E	

Please be aware that flight times are subject to change. Notification of schedule changes will be sent to the email address provided at the time of booking.

Do you have TSA Pre/®? Don't forget to add your Known Traveler Number (KTN) to your reservation here!

AA

mail.google.com



7:22



5G

Spirit ...



Seats

NAME

SEATS

19A | 19C
19D | 18E

Contact Information

Jane Bailon

JONEBAILON@GMAIL.COM




13473763459

US

Purchase Price

Flight Price	\$182.68
Bags	\$171.00
Government's Cut	\$45.40
Government's Cut	\$5.80
Total	\$406.88

Join ShopSmart* and get
\$20 CASH BACK
ON THIS BOOKING!



Join for Free!
ShopSmart

AA

mail.google.com



7:20

5G

Spirit ...



Google Travel

Travel with Google

Travel with Google

To:



jleebsal@gmail.com

Date:

October 12, 2021, 10:10 PM

Google Flights

Hello,

Thanks for booking with Spirit on Google — your reservation is confirmed

spirit

Your confirmation
code

FHFUVT

One way to New York

\$471.76



FRI, OCT 15 - LAS VEGAS TO NEW YORK

8:10 PM-12:47 AM 2h 37m

LAS (McCarran International Airport)-DFW
Spirit Airlines

AA

mail.google.com



9:43

◀ Search

5G



Sp+aff Hanacure

*Receipts
to get
Ready*

\$29.94

Aug 20, 2021 at 1:03 PM

✓ Completed

9:43

5G

◀ Search



Receipts



Shell
Bronx, NY

\$22.75

Aug 21, 2021 at 8:54 PM

✓ Completed

9:43

5G

◀ Search



Khari Barbie Beau

Receipts

\$51.15

Aug 22, 2021 at 3:50 PM

✓ Completed

9:43

Search

5G

X

...



Ariana Lemmons

Payment to Sarlisaboss

Receipts

\$130.00

For 2 of 2 payments for blue ysl bag

Aug 23, 2021 at 12:30 PM

✓ Completed

Web Receipt

9:44

5G

◀ Search



Just4kira Just4kira.m

Receipts

\$71.00

Aug 28, 2021 at 2:17 PM

✓ Completed

9:44

5G

◀ Search



Bath & Body Works

Bronx, NY

Receipt

\$21.83

Aug 31, 2021 at 1:13 PM

✓ Completed



275 East Sandford Blvd
Mt. Vernon, NY 10550
914-699-1555

Sale

Store: 1238 Register: 5
Date: 7/11/22 Time: 12:55 PM
Transaction: 18103 Cashier: 1995457
REWARDS NUMBER 6956134727

Qty	Item	Price	Amount
	READY INDEX MULCL		
1	072782110703	8.79	8.79
	STPLS 1SUB NTRK CR *		
	718103368254	0.99	0.35
Special Promotion: Limit 30 at \$.64 off (0.64)			
	STPLS 1SUB NTRK CR *		
1	718103368254	0.99	0.35
Special Promotion: Limit 30 at \$.64 off (0.64)			

***** Order Number 2231526531*****

	ESSAY/DOCUMENT-CUS		
1	1980563	6.29	6.29
	EXPRESS GUARANTEE		
1	2623897	1.89	1.89
	ESSAY/DOCUMENT-CUS		
1	1980563	6.42	6.42
	EXPRESS GUARANTEE		
1	2623897	1.93	1.93

Questions on Customer Order 2231526531
Call your local Staples Store

Subtotal 26.02
NEW YORK 8.375% 2.18

Total 28.20

US DEBIT USD\$28.20

Card No. : XXXXXXXXXXXX6154 [C]

Chip Read

Auth No. : 000903

AID.: A0000000980840

Verified By PIN

*Item is currently on promotion. Some coupons are only valid on regular priced items. Please see the coupon terms and conditions for details.

Staples Connect,
the working and learning store.
Discover every tool to take on tomorrow
including products, services
and inspiration that help you
unlock what is possible.
Shop Smarter. Get Rewarded.
Staples Rewards members get up to
5% back in Rewards.

Exclusions Apply. See an associate for
full program details or to enroll.

THANK YOU FOR SHOPPING AT



275 East Sandford Blvd
Mt. Vernon, NY 10550
914-699-1555

Sale

Store: 1238 Register: 5
Date: 7/11/22 Time: 11:44 AM
Transaction: 18095 Cashier: 1995457
REWARDS NUMBER 6956134727

Qty	Item	Price	Amount
***** Order Number 2231524426*****			
	ESSAY/DOCUMENT-CUS		
1	1980563	15.50	15.50
	EXPRESS GUARANTEE		
1	2623897	4.65	4.65

Questions on Customer Order 2231524426
Call your local Staples Store

Subtotal 20.15
NEW YORK 8.375% 1.69

Total 21.84

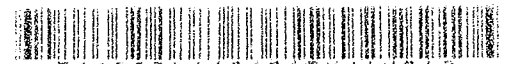
Cash 22.00

Change (0.16)

Staples Connect,
the working and learning store.
Discover every tool to take on tomorrow
including products, services
and inspiration that help you
unlock what is possible.

Shop Smarter. Get Rewarded.
Staples Rewards members get up to
5% back in Rewards.
Exclusions Apply. See an associate for
full program details or to enroll.

THANK YOU FOR SHOPPING AT
STAPLES CONNECT!



01133RL119131PY4AWPAQ0

Customer Copy

CUT HERE

YOUR OPINION COUNTS
AND WILL BE REVIEWED
BY THIS STORE'S MANAGER!

Please take a short survey
and be entered into a
monthly drawing to win one of four
\$500 Staples gift cards.
No purchase necessary.
Scan the QR code below



Receipts
Expenses

7:36

5G+

Lyft

You spent \$9.65 at Lyft



Cash App

cash.app

To:



Joe

Date:

October 7, 2021, 12:26 PM



Lyft

San Francisco, CA

\$9.65



AA

mail.google.com



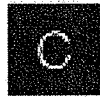
Receipts
for expenses

7:35

5G+

Lyft

You spent \$60.70 at Lyft



Cash App

cash.app
make money

To:



John

Dated:

October 16, 2021, 1:41 PM



Lyft

San Francisco, CA

\$60.70

AA

mail.google.com

